

APPENDIX T0 (Continued)

I62 VANDRUFF, DIANE (1)

Comment Letter I62

Robert Dmohowski

From: Diane VanDruff <dianeisdibo@yahoo.com>
Sent: Tuesday, August 21, 2018 10:51 AM
To: City Council
Subject: North River Farms Development

August 21, 2018
Oceanside City Council Members
Council Chambers, City Hall
Oceanside, California

Dear Council Members,

I respectfully request that you cease any and all decisions regarding the North River Farms area development. This special meeting planned for Wednesday, August 22, is a way to circumvent the public's opposition to developing our open spaces and farmland without proper infrastructure. The Council's planned "special development agreement" with the North River Farms development group is an underhanded way to run over your constituents. By not gaining the perspective of the people who live nearby and are most affected by this development you are also failing to get the insight of both sides of the issue.

It is only proper that you stop any and all decision making regarding the development of this area and bring the issue to the voters for a decision. Please remember the City Council's only purpose is to serve the voters that put you there.

Respectfully,
Diane VanDruff
Oceanside homeowner and constituent

I62-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I63 JOHNSON, DONALD

Comment Letter I63

Robert Dmohowski

From: Don Johnson <zoniedon@gmail.com>
Sent: Monday, August 20, 2018 11:17 PM
To: Robert Dmohowski; City Council
Subject: the proposed project near Wilshire Rd

I am a resident, immediately across from the proposed development.
Our family has lived here since the end of WWII.
My brother and I went to the San Luis Rey one-room grades 1-8 school near the Mission and from there went on to Oceanside HS and JC.
I have watched this area grow and I can predict the impact of this new development will be devastating to anyone from here to the end of North River Road and even west and south.

What are these people thinking that see this as a boon for the city?
It appears they have already decided and tossed off the advice of even their own planning commission.

I had planned to live my life to the end on the family property but I can see that dream is destined to be a nightmare instead.

I and my immediate neighbors attended the earlier meetings at the city council but we have given up.
This letter is obviously my last gasp of protest.

Donald Johnson
284 Wilshire Road
Oceanside, CA 92057

I63-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I64 CEFOLA, ELAINE (1)

Comment Letter I64

From: Elaine <ecefola7@att.net>
Date: August 22, 2018 at 4:12:24 PM PDT
To: "Council@ci.oceanside.ca.us" <Council@ci.oceanside.ca.us>, Chuck Lowery <clowery@ci.oceanside.ca.us>, Esther Sanchez <esanchez@ci.oceanside.ca.us>, Jack Feller <jfeller@ci.oceanside.ca.us>, "pweiss@ci.oceanside.ca.us" <pweiss@ci.oceanside.ca.us>, Zack Beck <zbeck@ci.oceanside.ca.us>
Subject: CORRECTION ON Email: Aug. 22 re NRF proposal ramifications
Reply-To: Elaine <ecefola7@att.net>

See correction below on double negative.Sorry.

----- Forwarded Message -----

From: Elaine <ecefola7@att.net>
To: Jerry Kern <council@ci.oceanside.ca.us>; Esther Sanchez <esanchez@ci.oceanside.ca.us>; Jack Feller <jfeller@ci.oceanside.ca.us>; Chuck Lowery <clowery@ci.oceanside.ca.us>; "pweiss@ci.oceanside.ca.us" <pweiss@ci.oceanside.ca.us>
Cc: Zack Beck <zbeck@ci.oceanside.ca.us>
Sent: Wednesday, August 22, 2018 4:03 PM
Subject: Aug. 22 re NRF proposal ramifications

Hello Mr. Mayor and Esteemed Council Members,

I urge you to vote No on Item #14 on the North River Farms' request for an agreement on this development.

We are in an historical period in the history of California with the number and frequency of fires occurring all year long in our

I64-1

I64-2

APPENDIX T0 (Continued)

state. The public utilities are concerned with exorbitant costs of the homes and commercial properties being destroyed. Homeowners, renters, the elderly and the disabled are being uprooted. It's life that has disrupted folks everywhere.

Fight against any attempts for off shore oil drilling from this corrup administration in Washington. Climate change has been happening and developing over 100 years but was well hidden. (Time.com)

Scientists now say that our dry vegetation or land with the high winds are causing the brush to act as fuel to ignite these fires.

Insurance companies are beginning to take a very close look at new construction developments to ascertain if they are insurable and if they want the risk at all. These places may be unsaleable!

No new homes should **not** The word "not" should be deleted.

be built despite what the State dictates.

Instead, it should read as:

No New homes should be built despite what the State dictates.

Fight them instead. It is not logical. Inland in Southern California carries a very high risk of some sort of physical damage. Yes people need a place to call home. I also read today that wealthy folks are moving closer to the coastline to be safer, of course Mother Nature may have other ideas in mind later on but who knows.

164-2
Cont.

164-3

APPENDIX T0 (Continued)

Be creative. Building near mass transit, like our cross county light rail, can be an answer however what is the ridership numbers like?? There is a stigma to taking buses and trains vs the convenience and expense of one's car.

Instead think of expansion of our corporate parks with incentives to come to Oceanside to enhance our tax base. Think of increasing the TOTax on hotels or structures very close to the beach within a certain radius for the tourists. The half cent tax for our city should also help.

Not everyone can live close to the coast. We get that. You folks on Council should not invite developers of more homes to our area nor build high density places like Mission Lane that is no better than older, inner cities on the East Coast! That is not living comfortably.

It's unfortunate we're in this mess, yes, and our service people: police, firemen, teachers, cleaning folks, restaurant workers who get low wages are commuting long distances.

What is the answer? Think long and hard and come up with solutions. Remember places like Harmony Grove with one road in and out in the last big fires. Developers want to build another 900 homes there. Foolish and unsafe!

Elaine Cefola
1528 Saran Ct.
Oceanside, CA 92056
ecefol7@att.net



164-3
Cont.

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I65 MASIELLO, ELLIE

Comment Letter I65

Robert Dmohowski

From: Cox <elliemas@cox.net>
Sent: Sunday, August 19, 2018 5:39 PM
To: City Council
Subject: North River Farms

I am a resident of the Jeffrey's Ranch area of Oceanside and I would like to register my opposition to this project before the necessary infrastructure needs are studied and are in place. Traffic is a nightmare as it is and the new assisted living development is not open yet.

I65-1

Best Regards,
Ellie Masiello

Sent from my iPhone

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I66 FIEDLER, EMMILY

Comment Letter I66

From: Emmily Fiedler <emmily_anne@hotmail.com>
Sent: Wednesday, August 22, 2018 1:44 PM
To: Jeff Hunt <JHunt@ci.oceanside.ca.us>
Subject: Re: CONTINUED - North River Farms - Development Agreement: City Council Aug 22, 2018

Dear Mr. Hunt,

I live in Sleeping Indian and need to take North River Road to work every day. I have put forth my concern about the traffic impact a new community will have on the road in the past. I would like to mention it again. The development committee suggested widening North River Road to add lanes. As someone who uses the road every day to commute, I don't see it as an effective solution. Morning traffic at the intersection of North River Road and Vandegrift is often backed up past the signal in front of Del Rio Elementary school. This traffic is drivers waiting to turn left. Once past the light in front of the school, these drivers wait through about three signal cycles to get onto Vandegrift. Then they wait through at least three more to get onto College Blve. As it is, it can take up to 30 minutes to go 1/2 mile.

Widening North River Road will only help on North River Road. Traffic will bottleneck on Vandegrift and College.

The new community would increase traffic on Sleeping Indian Road, part of which is privately owned. Many drivers who have discovered Sleeping Indian as a "cut through" drive dangerously, at speeds that the road is not designed for. Many pets and wildlife in the neighborhood have been hit by careless drivers. People also walk their dogs on our roads. Additionally, the roads are not designed for the amount of traffic the new community would bring.

Adding the new community will increase commute traffic and when evaluations are necessary for fires. The roads get congested and dangerous when people from the direction of Fallbrook have to evacuate for fires. Adding additional homes will increase danger and make it more difficult to evacuate. This is a major concern.

I hope these concerns are considered seriously.

Thank you,

Emmily Fiedler

Sent from my LG Phoenix 3, an AT&T 4G LTE smartphone

I66-1

I66-2

I66-3

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I67 POKLETAR, FAYE

Comment Letter I67

Robert Dmohowski

From: Faye Pokletar <fayelandscape@gmail.com>
Sent: Monday, August 20, 2018 7:26 PM
To: Robert Dmohowski
Subject: North River Farms begins with the letters NO!

August 20, 2018

Dear Council Member,

My family and I have lived in Oceanside for 15 years. Our kids, now teenagers, have grown up in South Morro Hills their entire lives. My husband has been a teacher in the Oceanside School district as long as we've lived here. We are vested in this community. Of all the places we looked, we chose to live in South Morro Hills because we loved the rural, agricultural nature of the land. We liked that we weren't on top of our neighbors, and had room to spread out, enjoy our animals, and breathe.

I67-1

It's a privilege to drive home after work to our piece of paradise, and we count our blessings that we could (barely) afford such a wonderful place to bring up our daughters in our forever home. We like that there was, and is, zoning in place to ensure our area is 2.5 acres d.u. minimum.

We hear that some Council members consider what one can do with their property a high priority. Have you stopped to consider that by allowing North River Farms to construct a residential community denser than the minimum 2.5 acres d.u. **STEALS MY FAMILY'S QUALITY OF LIFE THAT WE BOUGHT INTO 15 YEARS AGO?** This in effect negates what we can do with our property because we can't enjoy the rural atmosphere we know and love. We see it as if you proceed with approvals of NRF's, you are not allowing us our rights.

I67-2

We chose to live in SMH's because we didn't want to be around high density housing. We didn't want traffic circles, traffic lights, curbs and sidewalks. We would have bought a home elsewhere if we did!

Please allow South Morro Hills to continue with their Vision Plan unhindered by this Greedy Development called North River Farms. **Please stop the NRF's project. It is too dense!** The traffic on North River Road has already increased dramatically since the widening of the 76, and this development hasn't even begun!

I67-3

Best,

Faye and Robert Pokletar
6058 De La Rosa Lane
Oceanside, CA 92057

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I68 LEWIS, FEROL

Comment Letter I68

Robert Dmohowski

From: ferol lewis <ferollew@yahoo.com>
Sent: Tuesday, August 21, 2018 7:08 AM
To: City Council
Subject: North River development proposal-Don't agree to it!

Hello,

As elected council members I encourage you to listen to the experts and DO NOT APPROVE the development modified or otherwise of the North River Development proposal UNLESS you WILL FORCE THEM TO PAY FOR INCREASED TRAFFIC and noise that will be a secondary affect (or collateral damage) of this development.

I68-1

There should be contingencies to provide noise abatement for those on the SR 76 and on Melrose .

I68-2

The increased traffic has to be a cost to the developer to develop a real plan to address the additional consequence of the development.

I68-3

This is something that SHOULD BE VOTED ON BY THE RESIDENTS OF THE COMMUNITY however if you allow a back room deal as it appears, then please have consideration for your neighbors and the impact of the decision on the community as a whole not just the parcel of land that the development would reside on.

Please don't agree to this without a comprehensive plan to address ALL of the issues and impact that this development has on the traffic, noise and overall well being of the community, it is not always about revenue despite what the developer will tell you.

I68-4

Listen to the experts, since you are not and you are not expected to be that is why you have experts, that recommend rejection of this proposal.

Thank you,
Ferol Lewis

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

169 DUCLOS, GREG AND JENNIFER

Comment Letter 169

From: Gregory Duclos <gduclos@msn.com>
Date: August 21, 2018 at 9:51:37 PM PDT
To: Jennifer Duclos <jennduclos@hotmail.com>
Cc: "council@ci.oceanside.ca.us" <council@ci.oceanside.ca.us>
Subject: Re: North River Road

Dear Jerry Kern,
I have supported you financially and politically with time, signs, etc. I am told this is your idea to develop on our open land here in Oceanside. Do you desire Oceanside to be like LA? Continue the concrete jungle? And in this case we're taking out our precious farmlands?? This is absolutely despicable. We need to investigate your motives. Financial? Kickbacks? Our open land and more importantly our farmland is being diminished. We need to protect it at all costs. As conservatives this is vital. This initiative is unacceptable. Per our meeting this evening your supporters are going to put together an initiative to recall you if you push forward with this greed.
Game on!
Sincerely,
Greg Duclos
Wilmont Ranch
415-408-8702

169-1

On Aug 21, 2018, at 6:53 PM, Jennifer Duclos <jennduclos@hotmail.com> wrote:

Good evening,

The residents of our community are opposed to the development of precious farm land and open space. This was zoned agricultural for good reasons. We all live here because we love this area and respect the people that work hard to preserve this valuable resource. Please listen to what the residents of the surrounding area are requesting! Do not move forward with this plan as it will have no positive impact to Oceanside. This is all about greed and we know the politicians that are in favor of this passing. Please do the right thing.

169-2

Thank you,
Jennifer Duclos, homeowner

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

170 RUIS, NANCY

Comment Letter 170

Robert Dmohowski

From: Nancy Ruis <jnruis@gmail.com>
Sent: Tuesday, August 21, 2018 1:36 PM
To: City Council
Subject: North River Farms Project

Dear Mayor and City Council,

My husband and I have resided just off Sleeping Indian in Morro Hills area of Fallbrook since 1986. We are elderly, so will not be attending the meeting as we do not drive at night. We did attend a meeting at the Recreation Center on North river Road and presented our views to the staff present.

170-1

The development you are considering will greatly affect our quality of life. The traffic will be tremendously increased on Sleeping Indian with people trying to get to and from 76 and 15. We have witnessed this same problem with the traffic in the hills of east Vista with people trying to get through and around 78 and 15. Residents there cannot get out of their driveways during the morning or afternoon hours.

170-2

The second and very major issue is fire and evacuation. During the December 7, 2017 fire and evacuation, we had to wait hours to get in or out. If the fire had not been stopped, it is probable that many people would have perished in their cars.

170-3

We are at your mercy as we do not have a vote in Oceanside, even through we are greatly impacted. Please consider your decision carefully. Your paid staff has recommended against the development. You are considering changing the last Agricultural area in Oceanside, and it will affect the lives of hundreds.

170-4

Sincerely,
Jack and Nancy Ruis
4921 Conejo Road
Fallbrook, CA 92028
760-728-9141

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I71 ZAWACKI, JANE

Comment Letter I71

Robert Dmohowski

From: Jane Zawacki <jane.zawacki@gmail.com>
Sent: Monday, August 20, 2018 5:38 PM
To: City Council
Subject: North River Farms Development

I strongly oppose the development of this land. The issues are many and complex. Traffic safety has not been adequately addressed. Fires are more frequent, an evacuation would be dangerous, if not impossible. Our law enforcement and first responders are not equipped to address the needs of more people. The safety of the schools and the number of additional students is also an issue.

You will hear from many residents who oppose this project AND the way it has been handled by the council. Our votes count, do not approve this project.

Regards,

Jane Zawacki
1832 Via Allena
Oceanside CA

I71-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I72 BLACKBURN, JEANETTE

Comment Letter I72

Robert Dmohowski

Subject: FW: North River Road Development

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

From: jeanette blackburn <webnett@sbcglobal.net>
Sent: Tuesday, August 21, 2018 7:30 PM
To: Jeff Hunt <JHunt@ci.oceanside.ca.us>
Subject: Re: North River Road Development

Great! Mr. City Planner of Oceanside. So, what do you think of the requested zone changes to our fair city? It seems the city should slow down on any residential expansions and focus on bringing in more commercial development—particularly referring to the dump called the “Swap Meet” at the old Drive-in theater site. That is one embarrassing mess to see while driving through the river valley here. Let’s see some positive changes here and no more zone changes to accommodate the residential developers. And please, clean up the theater site.

I72-1

Jeanette Blackburn

Sent from my MaxiPad

> On Aug 21, 2018, at 6:53 PM, Jeff Hunt <JHunt@ci.oceanside.ca.us> wrote:

>

> NORTH RIVER FARMS ITEM CONTINUED TO DATE UNCERTAIN. The North River Farms applicant has requested that the Development Agreement scheduled to be reviewed by the City Council on Wednesday August 22, be continued to a date uncertain. The item will be re-noticed prior to any reconsideration at a future public hearing.

>

> Jeff Hunt, AICP

> City Planner

> City of Oceanside

>

>

> -----Original Message-----

> From: jeanette blackburn <webnett@sbcglobal.net>

> Sent: Sunday, August 19, 2018 6:29 PM

> To: City Council <Council@ci.oceanside.ca.us>

> Subject: North River Road Development

>

> As a tax payer and a voter, I urge you all to reject the request for a zone change along North River Road, to allow for housing developments, etc. Our traffic along River Road has become increasingly heavy, with traffic from Camp Pendleton. Since the rate of deployment is down, the Marines and families are staying here, and making for more congestion than when we have heavy deployments. And since the widening of Hwy. 76 to the I-15, we have more people cutting through the North River Road exit from the 76, instead of staying on the 76 through Oceanside. And then there is the issue of supplying water to this new developing area, along with the increase in sewage and other city services, such as police, fire, ambulance services, and schools.

I72-2

I72-3

>

> This council seems bent on building and adding to the problems of our city. PLEASE consider the residents that already live here, and want to maintain our quality of life. Stop with the zone changes here in my neighborhood! That includes the Apartment expansion on North River Road! If I wanted congestion, I would have bought my home in San Diego!

I72-4

>

APPENDIX T0 (Continued)

> If you love your City of Oceanside as I do, you will deny the zone change requests by all of these developers who want to increase the density of our housing.

172-5

>

> Jeanette Blackburn

> 4369 Arbor Cove Circle

> Oceanside, CA. 92058

>

> Sent from my MaxiPad

APPENDIX T0 (Continued)

I73 CARDANI, JOE

Comment Letter I73

Robert Dmohowski

From: Joe Cardani <cardani@gmail.com>
Sent: Monday, August 20, 2018 12:04 PM
To: City Council
Subject: The North River Farms Development

Good Morning.

I attended the Planning review for the North River Farms development at which it was rejected. I thought it a proper decision. There clearly was an arrogant lack of care for the chaos and havoc that the development would bring down upon the surrounding infrastructure on both sides of the river. So, at the upcoming review, I will be listening to hear what exactly what was changed to make their proposal more appropriate. I'm not sure there is anything the developer can do without relying on taxpayer money to alleviate the congestion and overloading after the fact, so, I will be listening also to hear how this is addressed. Finally, I will be listening to hear how I might be voting in the next election.

I73-1

Joe Cardani
cardani@gmail.com

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I74 BAILEY, KAREN

Comment Letter I74

Robert Dmohowski

From: Karen Bailey <kab323holiday@yahoo.com>
Sent: Monday, August 20, 2018 5:57 AM
To: City Council
Subject: North River Farms Development

As a resident who would be effected by the proposed development in this area, I would like to add my voice to those objecting to this proposal. Traffic in general has become a major negative for us in the last number of years. Add to this, potential water supply issues; and other quality of life issues. In my opinion, this proposal has more negative impact than positive for those of us living and working in this area.

I74-1

North River Area Resident
Sent from my iPad

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I75 COMBS, KATHY

Comment Letter I75

From: Kathy Combs <combs.kathy@gmail.com>
Sent: Monday, August 20, 2018 2:41 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: North River Farms development agreement - please vote no

Hello Oceanside City Council,

Please vote no on the North River Farms project.

This project requires a major amendment of the general plan. The City Council has full discretion to add whatever conditions they want there is no need for negotiation. And a complete review must be allowed including consideration for any environmental issues.

Also, the project review should be an open and transparent process. The developer is proposing no real public benefit above what they already are/can be required to do.

Thank you.

Kathy Combs

I75-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I76 KEN

Comment Letter I76

Robert Dmohowski

From: Ken <kdepesa@gmail.com>
Sent: Monday, August 20, 2018 5:58 PM
To: City Council
Subject: N R F

When are you going to listen to your constituents who elected you , we don't want this high density, high traffic, congestion, it's a terrible project, you're own staff recommend denial.

I I76-1

Sent from my iPad

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I77 HARRINGTON, KIM

Comment Letter I77

Robert Dmohowski

From: Kim Harrington <bjnkim@aol.com>
Sent: Monday, August 20, 2018 3:26 PM
To: City Council
Subject: North River Farms

Please, please, please do not allow the North River Farms development in our agricultural area. It is nothing but a huge tract house development in an inappropriate area. City services are already stretched thin and over development has lowered the quality of life of people already here. We don't need more tracts and more people. We need to improve the quality of life for the 185,000+ already here. Please think of the people who elected you for a change, instead of developers.

I77-1

Thank you!
Kim Harrington

Sent from my iPhone

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

178 FLINN, LAURA

Comment Letter 178

Robert Dmohowski

From: David Flinn <flinn_david@yahoo.com>
Sent: Monday, August 20, 2018 6:28 PM
To: Robert Dmohowski
Subject: high density development is wrong

Dear Sir,

I am writing to you so that you and the City Council are aware that the high density North River Farms project in the rural area of Oceanside is a terrible TERRIBLE idea. North River Farms proposes to add almost 700 units to infrastructure that cannot handle the current use. Oceanside has daily gridlock traffic with the current development. I do not support adding 700 high density units to a rural farming neighborhood.

Please do not allow the last remaining farming area in Oceanside to become another bumper to bumper crowded tract housing development.

Sincerely,

Laura Flinn
Oceanside Resident

178-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

179 BRITTON, LAURI

Comment Letter 179

Robert Dmohowski

From: Lauri Britton <lbritton2@yahoo.com>
Sent: Tuesday, August 21, 2018 2:18 PM
To: City Council
Subject: Opposition to North River Farms Rezoning and Development

Dear Oceanside City Council

I am writing to you about the proposed development in South Morro Hills, Oceanside, CA. I am a resident in the 92057 area zip code.

179-1

I support the farmers and zoning to remain the same with single family homes to be built on a minimum of 2.5 acres of land.

One - It is much healthier for people to eat food grown locally. At a time when urban communities are creating rooftop gardens and gardens in empty lots it is imperative that we preserve this precious farmland. It is more likely that perishable food coming from Arizona or Mexico will be picked too early and have other problems because of transportation. For example see one of several articles about locally grown food, "[What's Wrong With Buying Food From Far Away And How You Can Buy Better.](#)" More people want to purchase locally grown food whether at farm stands, grocery stores, or in restaurants. In addition the community needs to help these farmers keep their farms economically stable which may mean they receive discounted water rates. Oceanside needs to preserve South Morro, support the farmers, and prevent it from becoming a residential community.

179-2

Two - Oceanside has made many land development mistakes which has kept many of its property values low and correlates to the underperforming public schools. In prime land use areas, Oceanside has auto junk yards, an abandoned drive-in theater (now a swap meet), and trailer parks. We have more fast food chain restaurants, Dollar Stores, Big Lots, and Walmarts than any other community north of La Jolla. I don't want to see Oceanside change rural zoning and develop farmland while these other areas could be used for development.

179-3

Three - We can't have a knee-jerk reaction of destroying farmland because San Diego County has a "housing crisis." There are already too many residential units being built putting more cars on the freeways and city roads. Driving on the 76 is a nightmare. People traveling at 60+ mph and then screeching to a stop at the many stop lights along the road is dangerous. Is the 76 a freeway? It should be. The safest thing for the city to do would be to make the 76 a freeway in order to decrease the number of accidents. More housing, apartments, and a hotel will greatly increase the number of cars on the road in this area. As the developers have proposed, expanding North River Road will not help commuters on highly traveled roads of Highway 76, College, El Camino, Douglas, Vandergrift - all of these roads and more will be impacted with more traffic and development.

179-4

Four - College, Vandergrift, 76 all are crowded and heavily impacted by traffic. It can take two or more light cycles to make a left from Vandergrift to College. Also because of a heavily used bus stop at North River Road, a driver could wait more than five minutes for bus commuters to cross Vandergrift. For the safety of pedestrians, the city should install footbridge over Vandergrift separating people from traffic. This pedestrian/vehicle problem will greatly increase with more housing on North River Road.

179-5

Five - How will the City of Oceanside mitigate against water shortages, energy crisis, and an abundance of trash with additional homes, apartments, and hotels being built? In our home, why is it when we use less water and less energy our costs increase? There is no relief in sight for us on the rising costs of water and energy. With more development, more people will strain the systems in place.

179-6

Unfortunately city, county, and state planners have not prepared for the increase in population here in San Diego. We have too many cars on the roads, inadequate public transportation, diminishing clean water, and

179-7

APPENDIX T0 (Continued)

increasing energy prices. I implore you to put the needs of Oceanside residents before the profits of developers. Do not sell this farmland to developers. Rather help the farmers stay in business to produce food for us.

↑ 179-7
Cont.

Sincerely,
Lauri Britton
1214 Bellingham Drive
Oceanside CA 92057
(760) 710-7383

APPENDIX T0 (Continued)

180 RICE, MARC

Comment Letter 180

Robert Dmohowski

From: Marc Rice <ricema@gmail.com>
Sent: Sunday, August 19, 2018 8:58 PM
To: City Council
Subject: Re-zoning for Developers - North River Farms

Dear Mayor and Council,

I'm hoping I will be pleasantly surprised for once. Since buying our home in Oceanside over 25 years ago, I can't remember one time that the Oceanside City Council turned down a developer's request to re-zone property or approve a project. And it looks like you are planning to do that again with the North River Farms development by Integral. Even though the *Planning Commission and your own professional staff are recommending against it.*

I am asking you to VOTE NO on this re-zoning of 2.5 acre lots to a much higher density and adding to the already congested traffic, the demand for water and emergency services, and all the other negatives that this will bring. Have you forgotten the gridlock last December when the fire was approaching that area? If you go forward with this, rushing approval through before the November election just in case the SOAR initiative passes, there will be no doubt about why you voted to approve it. Those of us who already live here deserve a decent quality of life, and things like this take away from it. Please say NO.

Marc Rice
Rancho Del Oro resident, 25+ years

180-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

181 OCHS, MARK (1)

Comment Letter 181

Robert Dmohowski

From: MARK OCHS <ochs.m@sbcglobal.net>
Sent: Monday, August 20, 2018 8:10 PM
To: Robert Dmohowski
Subject: North River Farms Development agreement

Honorable City Council,

The proposed Development Agreement for the North river farms project being considered on August 22nd, should be denied. The project continues to be non conforming and lacks any attributes overriding the concerns brought forth by the City Planning Commission in their recommendation to deny the original application to the city of Oceanside. The request for a development agreement as submitted provides no additional offer or benefit to the City of Oceanside and its residence beyond the mitigation efforts that will be part of the findings and requirement disclosed in the Draft E.I.R. The unsurmountable conflict, negative resulting impacts (infrastructure, traffic and precedential effects) and lack of need for this project, clearly provides the Council obvious direction and responsibility to deny this premature development agreement request.

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

181-1

1. Traffic impacts heading east from the project have been completely ignored. North river road should be improved, widened until reaching Highway 76.
2. Infrastructure improvements (Sewer, reclaimed water, storm drain and off site improvements) should be solely the burden of the developer without the suggested repayment by future down stream development.
3. The "Community Facility District" should be solely the burden of the Developer. Insurance and management of this district should remain a compelling offer for the Development agreement consideration.
4. Affordable housing should be included in the project. No consideration should be given to alternative options.
5. Green House Gases should be mitigated by design and reduced by building limitations, not solely by purchase of carbon off sets.
6. Agricultural mitigation should not be achieved through purchase of agricultural conservation easements in other county locations. Mitigation should replace the 176.64 acres within the Oceanside city limits.
7. Native America artifacts have been completely overlooked in the Draft E.I.R and movement forward should include oversight by a third party during and excavation, to identify any and all artifacts discovered and a plan be in place to relocate all artifacts to a designated location onsite in respect for and in tribute to all tribal ancestry.
8. Vested rights duration. If the Development agreement is considered viable, It should be limited to a maximum term of five years, as projected by the developer in the estimated timeline to complete the phasing. Going beyond this duration restricts the City of Oceanside of it right to review all projects completely with unrestricted discretion.

181-2

181-3

181-4

181-5

181-6

181-7

181-8

181-9

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

181-10

Respectfully,
Mark Ochs
Sleeping Indian Road

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

182 MCMAHON, MIKE

Comment Letter 182

Robert Dmohowski

From: Mike McMahon <2mmcmahon@gmail.com>
Sent: Sunday, August 19, 2018 10:58 AM
To: City Council
Subject: North River Farms Project - VOTE NO

Dear City Council,

As a north county resident we have seen all too often this type development project of pushed through and voted on without a proper CEQA and public review process (case in point - the 85/15 Agua Hedionda Plan to our south). We expect our representative city council to be cognizant of Staff, Planning Commission, and overwhelming public concern in opposition to this project. **Please do the right thing and VOTE NO on this development agreement.**

182-1

Thank you,
Mike McMahon

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

183 MELLANO SENIOR, MIKE

Comment Letter 183

Robert Dmohowski

From: Mike Mellano Senior <hmmellano@mellano.com>
Sent: Tuesday, August 21, 2018 2:46 PM
To: City Council
Subject: The North River Ranch Project

Mr. Mayor and City Council

My family and I have owned land, farmed and lived in So Morro Hills for 50 years. I am writing to you because I cannot attend tomorrow evening but feel very strongly that the North River Ranch Project should move forward. First and foremost, I very much believe that the owners of this property have a constitutional right to develop this property if they wish. They are simply exercising that right as property owners which is not illegal or immoral in any sense of the word. In addition, Oceanside desperately needs more housing and this project will provide some of that housing.

Relative to the various reasons given to oppose this project I would like you to please remember that most of the people who oppose this project have opposed the very improvements that they are now saying are reasons that the project should not be allowed to move forward. In addition they have opposed an updated master plan for this area that would have dealt with all the issues they are now bringing up.

I therefore respectfully request that you allow Integral to negotiate a development agreement at this time rather than try to take away their constitutional rights as property owners.

If You have any questions please feel free to call any time
Michael Mellano Sr.

Mike Mellano Senior
SLR Office
Office 760-433-9550 x121
Mobile 760-717-8679



183-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I84 KOGAN, MILTON

Comment Letter I84

Robert Dmohowski

From: Milt Kogan <miltonkogan@aol.com>
Sent: Tuesday, August 21, 2018 2:00 PM
To: Robert Dmohowski
Cc: City Council; lb1122@hotmail.com
Subject: North River Farms

Dear Council Members,

I must concur with SMHills Association's assessment of the North River Farms proposal.

Those of us who live in the South Morro Hills district realize what is at stake in the suggestion that over 666 dwelling units, using North River Road as the project's main artery, would do to the safety of our families in advent of another fire or catastrophe in our area. Life and death are at stake in any congested escape to Oceanside City.

We are approximately 1/8th of Oceanside's land mass - the only remaining agricultural land and all the advantages that such open space provides all our citizens - fresh produce, fresh air, wildlife would be severely impacted. At least the requirements of the existing General Plan address all these concerns. I recommend the North River Farms proposal be postponed until full impact studies are completed, presented to the public and are openly discussed and voted upon by the full Oceanside public.

Milton Kogan
miltonkogan@aol.com

I84-1

I84-2

I84-3

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I85 JOHNSTON, PHIL (1)

Comment Letter I85

Robert Dmohowski

From: Phil Johnston <pfjohnston@runbox.com>
Sent: Monday, August 20, 2018 10:58 PM
To: City Council
Cc: Robert Dmohowski
Subject: North River Farms proposed project needs to be rejected

Oceanside Council Members:

The North River Farms proposed project needs to be rejected. The project proposal either needs serious rework before it can be considered, or it needs to be abandoned.

A considerable fraction of the project is situated within the 100 year flood boundary. Furthermore, significant parts of the project are situated in the San Luis Rey River Floodway. Both the 100 year flood boundary and the Floodway are clearly indicated on Oceanside City FIRM maps. These maps clearly state the floodway "Must be kept clear of encroachment....".

For the promoter to not consider the location of the 100 year flood and the floodway location is embarrassingly sloppy work. Worse yet, this information was presented to the promoter at the 13 December 2017 EIR Public Scoping meeting (and to Mr. Dmohowski in an 11 January correspondence). Even though they knew of this life-threatening hazard at an early stage of the EIR process, the promoter did not alter their plans in the slightest. What an astonishing disrespect for the safety of the people who might wind up living in this ill-conceived development!

In addition to having the proposed project rejected, my opinion is the promoters should be issued a formal rebuke for proposing a project which would put citizens lives at risk by placing residences within the mapped 100 year flood boundary.

Please let me know if you would like further information regarding the flood risks in this area.

Thank you, Phil Johnston

I85-1

I85-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I86 BERRY, RALPH

Comment Letter I86

Robert Dmohowski

From: Ralph Berry <ralph.berry@gmail.com>
Sent: Tuesday, August 21, 2018 6:46 AM
To: City Council
Subject: doing things for and by the people

i hope that the good people of oceanside, all citizens, and government members vote against the upcoming development agreement so that the population of people who reside in oceanside can decide what is best for the town, not a handful of money makers, caring not for the people but caring only for the amount of money they stuff in their pocket. thank you for you supporting your people. there is a review process in place to be used and not ignored.

I86-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

187 BURTON, RICHARD

Comment Letter 187

From: M.Mas-Burton & R. Burton <catalana@sbcglobal.net>
Date: August 22, 2018 at 5:49:59 PM PDT
To: "Council@ci.oceanside.ca.us" <Council@ci.oceanside.ca.us>
Subject: NORTH RIVER FARMS DEVELOPMENT
Reply-To: M.Mas-Burton & R. Burton <catalana@sbcglobal.net>

IN MY HUMBLE OPINION.....

Please to consider seriously the following as a way to solve this issue of agricultural land development planning in Oceanside.

If you must entertain developer planning for this area, THEN KEEP IT AGRICULTURAL.....AND PEOPLE/CROPS/AND ANIMAL FRIENDLY!!

Make the rule to be a minimum of 100 acre parcels zoned for agriculture and equine usage, with residences on those parcels for owners/workers only.

YOU WILL GET A NICE HIGH CLASS AGRI/EQUINE/RESIDENTIAL DEVELOPMENT. One that the sellers, the community and the developers will all be able to live with. And do not tell me this is not a practical solution because of the buyer costs, THERE ARE SOOO MANY BIG MONEY PEOPLE WHO ARE LOOKING FOR JUST SUCH A PROPERTY.

ONE TO BRING THEIR AGRI/EQUINE INTEREST TO, AND TO LOVE THEIR LAND AND COMMUNITY IN THE BARGAIN!

Do not allow the current owners to sell to another home tract/mega development outfit.

I moved to Jeffries Ranch from North Orange County, and surrounding points of once agricultural/semi-rural/ equine land to get away from the mess. AND NOW YOU WANT TO BRING IT HERE TOO?

THAT IS NOT IN THE BEST INTEREST OF THE LOCAL GENERAL POPULATION, IMHO!

AND DO NOT EVEN THINK ABOUT A MELROSE EXTENSION...OH WHAT A MESS THAT WOULD BE!!

Thanks for reading,

Richard Burton
1655 Arabian Way
Oceanside, CA 92057

187-1

187-2

187-3

187-4

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

188 SINCLAIR, RICHARD L.

Comment Letter 188

Robert Dmohowski

From: Richard L Sinclair <rlsinclair@mindspring.com>
Sent: Wednesday, August 22, 2018 12:35 PM
To: Robert Dmohowski
Cc: City Council
Subject: North River Farms Proposal

Dear Council Member

I write to you as a long time South Morro Hills resident and land owner who is seriously opposed to the North River Farms project.

Morro Hills would not be what it is today had the homeowners not fought hard for its current codes and density limitations. Land valuations, agriculture and occupancy would not be where they are if the City of Oceanside had not understood and protected their beautiful garden spot to the east.

Come to Los Angeles (where my principle residence is) and let me show you what happens to former historic scenic areas that have been overrun by thirsty land developers. . .and the blight, crime and mayhem that results.

Instead, we need more focus, help and recognition supporting the creative efforts of the SMH property owners, who are donating endless hours attempting to build Agritourism and property valuations. . .all to everyone's benefit.

This is neither the time nor the place to engage with "hit and run" land developers, seeking to destroy the very features that are helping to build and beautify the City of Oceanside.

Thank you for your understanding and kind considerations.

Richard L. Sinclair
4 Via Subida
Rancho Palos Verdes, CA 90275
310-831-9342

188-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

189 POKLETAR, ROBERT

Comment Letter 189

Robert Dmohowski

From: Robert Pokletar <pokletar.robert@gmail.com>
Sent: Monday, August 20, 2018 8:48 PM
To: Robert Dmohowski
Subject: NRF

Stop the NRFs project it is too dense and the City of Oceanside cannot handle the traffic.

Thank You
Robert Pokletar
South Morro Hills Home owner

189-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I90 MARTINEZ, ROGELINA

Comment Letter I90

Robert Dmohowski

From: Mimi Martinez <mimi.martinez@gemsloans.com>
Sent: Monday, August 20, 2018 3:31 PM
To: City Council
Subject: North River Farms

As a resident of the City of Oceanside. I oppose the building plan for North River Farms.

I I90-1

--

Rogelina Martinez
Ph: 760-415-2056

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I91 SOBKOW, ROSEANNE

Comment Letter I91

Robert Dmohowski

From: RoseAnne Sobkow <quailrun38@gmail.com>
Sent: Monday, August 20, 2018 1:51 PM
To: City Council
Cc: RoseAnne Sobkow
Subject: North River Farms proposal

We NEED Smart Growth not urban sprawl. We need our Agricultural Industry in order to provide for food production, not for Developers who build their developments, with the help of elected officials, reap their profits and then leave. Leave and then we the residents as well as taxpayers are left with the after growth mess to deal with. Taxes increase due to increased the increased need for schools, water and power needs, fire and police protection, traffic, roads, and the list goes on and on.

We who live in the Sleeping Indian area of Fallbrook and on the border of Oceanside, have already noted increased traffic traveling at high speeds created by those who do not live here pushing, passing on double yellow lines, these drivers have discovered that Sleeping Indian Road is a shortcut to Oceanside, etc., found during the Mission/76 construction. During the horrific fires when we have to evacuate from Fallbrook, Bonsall ect., Sleeping Indian Road is packed bumper to bumper with traffic desperately trying to get out of the fire area. Cyclists are told that Sleeping Indian Road is welcoming to them, I cannot count the close calls for both riders and automobiles on this winding, curving narrow road, not just by me, but by others as well. We do not need a 700+ housing development in the midst of our Agricultural Growing Grounds, we need them to remain Agricultural.

I91-1

I91-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I92 MCREYNOLDS, SANDY

Comment Letter I92

Robert Dmohowski

From: Sandy McReynolds <sandy.mcreynolds@gmail.com>
Sent: Sunday, August 19, 2018 4:02 PM
To: City Council
Subject: North River Farms

I oppose any development such as this.

- 1) fire danger
- 2) traffic
- 3) water
- 4) city council graft and corruption

I92-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I93 SEGIEN, SANDY

Comment Letter I93

Robert Dmohowski

From: Sandy Segien <sandygirl33@me.com>
Sent: Monday, August 20, 2018 11:30 PM
To: City Council
Subject: NRF

Stop the NRFs project it is too dense and the City of Oceanside cannot handle the traffic.

I I93-1

Sandy Segien

Sent from my iPhone

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I94 SCHWARZE, SHANNA (1)

Comment Letter I94

Robert Dmohowski

From: Shanna Schwarze <shannaschwarze@gmail.com>
Sent: Sunday, August 19, 2018 10:07 AM
To: City Council
Subject: Say NO to North River Farms

Dear Honorable Mayor and City Council,

Please vote no on the North River Farms project. This plan is the real estate equivalent to "fake news!" There are a number of reasons this development is BAD for Oceanside:

- This development is not environmentally friendly - it requires carbon credits to do so. Basically planting a tree in Maine to offset environmental damage to OUR city. I94-1
- This area is already plagued by traffic & fire danger. It was only evacuated 8 months ago and a larger region then ever needed to leave. Imagine 700 more homes needing to evacuate down a 2 lane road! {The DEIR already identifies the huge impacts this project will cause- traffic congestion -making evacuation even worse-, air pollution, excess GHG, 90% of emergency calls will take longer than 5 minutes to respond to growth inducing. } I94-2
- The current mixed-use North River Village Community condos on Waterview Way that were built with and around the San Luis Rey Transit Center is a good example of a developer suggesting boutique/retail when a community isn't ready for it. The entire ground level of the mixed-use North River Village Community is still entirely VACANT. The Fresh n Easy Grocery store across the street has also been VACANT for over a year. Retail is a dying trend. No one needs empty retail space or a token mattress store. I94-3

No one is against development. In fact, the local community has suggested a plan that will truly incorporate farm land, homes and a future of agri-tourism. <https://www.facebook.com/oceansideagrivision/> I94-4

Please put Oceanside – ALL of Oceanside – first and deny this vote.

Cordially,
Shanna Schwarze

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I95 OCHS, SHARON SINCLAIR (1)

Comment Letter I95

Robert Dmohowski

From: MARK OCHS <ochs.m@sbcglobal.net>
Sent: Monday, August 20, 2018 8:16 PM
To: Robert Dmohowski
Subject: North River Farms Development Agreement

Dear Oceanside City Council,

My family has owned our home on 3 acres in South Morro Hills since 1984. We have supported our community and paid our taxes with commitment for the best of Oceanside and our neighborhood.

Now, my husband and I, both 4th generation Californians, have to present ourselves before our own City Council to remind them that our Oceanside homeowner interests should be considered above an out of state developer desiring to change a longtime Zoning status to build over 10 times the current legal zoning limit on North River Road.

For over a year you have heard from Oceanside homeowners within a large radius of this proposed disaster. All have reminded you of the traffic nightmare, impact on community services and overall physical danger that YOU WILL be placing on your own Oceanside community. This national developer does not and will not live here.

In our 60 plus years, my husband and I can count over ten California communities we have lived in. While all good, NEVER, have we lived in a community with the level of pure joy that we and our neighbors share about living here in Oceanside's South Morro Hills. It is beautiful and we are working hard to develop ways to share it with others through our Agritourism efforts.

AND this is despite the high cost of water and electricity and the fear of being trapped escaping a fire on only two lane roads that includes North River Road.

You must recognize the NRF project is all crisp marketing and trigger themes designed to get people outside of our neighborhood area to support.

There is no support from the Oceanside neighborhood that will be forever changed.

I hope this letter will help you to further consider the impact of this project on the community you serve and I ask that you **DENY the PROPOSED Development Agreement presented by North River Farms.**

Sharon Sinclair Ochs
Sleeping Indian Road

Sent from [Mail](#) for Windows 10

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I96 COBAS, SUSAN

Comment Letter I96

From: Susan Cobas <scobas@aol.com>
Subject: No on NRF Project
Date: August 19, 2018 at 7:25:19 PM PDT
To: council@ci.oceanside.ca.gov

You already know all of the reasons why this project is a bad idea. And why the community believes the Council's support is unethical.

Please do your job and stop this nonsense.

Susan Shiomi Cobas

I
I96-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

197 TAUNT, TAMMY

Comment Letter 197

Robert Dmohowski

From: Tammy Taunt <oneseagoer@aol.com>
Sent: Sunday, August 19, 2018 7:16 PM
To: City Council
Subject: North River Farms Development

Dear City Council and Whomever Else this Concerns:

Our family has lived in Oceanside for over 20 years now. We love it. We live in the area north and east of the City of Oceanside golf course. I STRONGLY disagree with creating another huge block of homes in what is now an agricultural area. Old North River Road and South Morro Hills area is BEAUTIFUL and part of the VERY FEW areas left that are still open space.

197-1

Please understand that OPEN SPACE is NEEDED in EVERY community. I get that people want "affordable housing" and all of that. Taking away agricultural land and open space is NOT the answer to that. Plus, by doing so, it makes our whole area EXTREMELY DANGEROUS....especially when the fires come,..which are way more often than anyone is comfortable with. Our area is AT CAPACITY with population. We DO NOT need more people here!

197-2

Please consider some of the other options as a better idea...let the farmers in that area who want to make the most of their land and profit grow hemp and/or marijuana. The city can tax that and make a lot of money. Marijuana is legal, people, and there are LOTS of GOOD uses for CBD and other by products. It is a natural plant that is actually way better for anyone than the chemical filled pharmaceuticals that are now forced upon humans as "good" medicine.

197-3

The City of Oceanside has a very bad habit of NOT listening to the COMMUNITY. We all voted down at least 4-5 times those ugly and overbearing sky rise hotels and time shares that now occupy downtown Oceanside in the pier area without regards to what the community wanted and how to mitigate the extra tourists, traffic and all that goes with it downtown. It is now very ugly and super sad. Oceanside downtown is no longer a place for the people who live here and pay the bills....it is now for tourists.

197-4

PLEASE, I beg you....LISTEN TO US and be smart. NONE of us want Oceanside to become a concrete and ugly jungle like the City of Los Angeles. Please stop killing our beautiful community and gateway to San Diego County.

Thank you for your time. I hope you listen.

Best regards,

Tammy Taunt
oneseagoer@aol.com

*"The magic spell cast by the sea enlightens
all that embrace her..." Wyland*

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I98 MASTER, TERESA

Comment Letter I98

Robert Dmohowski

From: Teresa Masters <tam2819@cox.net>
Sent: Monday, August 20, 2018 11:06 AM
To: City Council
Subject: Massive Overbuilding

Council,
I object to the North River Farms overdevelopment.

I know for sure the 3-2 Council vote in favor, against Planning Commission 7-0 recommendation against the change in zoning from Light Industrial to Residential resulted in the high density abomination under development now at College and Old Grove Road.

There is no doubt that the next Fire coming our way will result in many RDO and Peacock Senior residents to incinerate (cremate) in place. I was on 4 day alert to evacuate the last two encroaching conflagrations. Yes, I know the next will not be an optional but mandatory evacuation. Have you created a route?

SOAR will pass and finally you will all be responsible to we the citizens.

Terrie
Teresa Masters
See you Wednesday

I98-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I99 HAAS, TERRY

Comment Letter I99

Robert Dmohowski

From: Terry Haas <thaas123@gmail.com>
Sent: Tuesday, August 21, 2018 9:58 AM
To: City Council
Subject: North River Farms project

Dear Council members, My wife and I have lived on Via Puerta del Sol off of North River Road for 25 years. During that time, we have seen the traffic congestion steadily increase on Douglas, North River Road and the 76 highway. We also recently experienced major losses on our property because of the Lilac fire and saw evacuation problems due to traffic congestion. We can only imagine the congestion on our surrounding roads if the NRF project is allowed to proceed, worsening evacuations if another fire comes through the area. Mitigation solutions proposed will not nearly solve these problems, and the character of the neighborhood will be forever changed, not for the better. If zoning changes allow this project, it's very likely that the large land owners and businesses in the area will also sell out to developers, negating the rural, bucolic nature of the area. As one of the last agricultural areas left in the county, this area's zoning and general plan should remain as is, and if changes are made, let the citizens of Oceanside decide on them. Sincerely, Terry A Haas, M.D.

I99-1

I99-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I100 EDMONDS, TOMMY (1)

Comment Letter I100

Robert Dmohowski

From: TOM EDMONDS <tbonafide1212@att.net>
Sent: Tuesday, August 21, 2018 7:36 AM
To: City Council
Subject: NRF

NRF= NO RESIDENTIAL FARMS!!!!

I I100-1

Tommy Edmonds

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I101 EDMONDS, TOMMY (2)

Comment Letter I101

Robert Dmohowski

From: TOM EDMONDS <tbonafide1212@att.net>
Sent: Monday, August 20, 2018 3:11 PM
To: City Council
Subject: NORTH RIVER FARMS PROJECT

Oceanside city council!

I am an oceanside resident and I do not want you to bypass full review of this project-it is too important to our community. Project review should be an open and transparent process- not done behind closed doors!

Tommy Edmonds
Oceanside resident

I101-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I102 D'AULA, TONY

Comment Letter I102

From: tony daula <tonydaula@yahoo.com>
Date: August 22, 2018 at 8:53:47 PM PDT
To: "Council@ci.oceanside.ca.us" <Council@ci.oceanside.ca.us>
Subject: North River Farms

Dear Sirs,

I am a resident of North River Road, specifically 30418 North River Road at the corner of via Puerta Del Sol.

Ive owned the property for 20 years and have seen the area slowly declining. What was once described as "The New Rancho Santa Fe" is no longer. Many homeless, traffic heavier every year and the terrible blight of the highway project just about killed the charm Bonsall had.

I strongly disagree with the development of this magnitude happening at this site. This is not suited for the area, the residents who actually live here do not want this, and the land that would be forever lost should be preserved. Not paved over.

The character and rich history of the area is a precious resource that will serve the residents of Morro Hills and Bonsall.

The council is going against the recommendations of its own staff and it is apparent that there is some collusion happening between members of the council and the developer.

I urge you to let the residents have a say in what happens to the land that they live on and pay taxes for.

Sincerely,
Tony D'Aula

I102-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I103 MARTIN, ULRICH

Comment Letter I103

Robert Dmohowski

From: ulrich martin <uli43@yahoo.com>
Sent: Tuesday, August 21, 2018 4:58 PM
To: Robert Dmohowski
Subject: NRF project.

This project is way too dense in the amount of units. It will make North River Road a traffic mess. The next thing is that the NRF builder wants us to foot the bill for "traffic rel." or build the bridge from North River Road to Melsee.

We urge you to deny this request by NRF.

Ulrich and Raili Martin
South Morro Hills residents

I103-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I104 SCHAFFNER, VICTORIA

Comment Letter I104

From: Vikki Schaffner <v.schaff49@gmail.com>

Date: August 22, 2018 at 1:03:54 PM PDT

To: <council@ci.oceanside.ca.us>

Subject: Development of North River Rd

I am an Oceanside voter and very much opposed to the development of North River Rd, our open spaces. To go against the voters will come back to haunt you.

Victoria Schaffner

I104-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I105 MCDOWELL, WILLIAM (3)

Comment Letter I105

From: Wmcd01@sbcglobal.net <Wmcd01@sbcglobal.net>

Sent: Tuesday, August 21, 2018 9:38 AM

To: City Council <Council@ci.oceanside.ca.us>

Subject: NRF DEVELOPMENT AGREEMENT

I am aware that the developer Integral has requested that the City begin negotiations on a Development Agreement for North River Farms and the item is on the Council Agenda for August 22nd, 2018.

I am concerned that the Council would seriously consider this request, even though the public review period for the DEIR does not close until September 10th, the project is highly controversial, and many significant and unavoidable impacts have already been identified by your own Staff.

I am requesting that the City Council take the recommendation of the City Staff and deny the request to negotiate a Development Agreement and defer any further consideration of a Development Agreement until after the environmental review has been completed and the voters, and you, have a chance to understand the impacts of the project.

I would further ask that each council member provide a clear statement of their position on this issue during the course of the upcoming council meeting.

Thank you.
William McDowell
921 Sleeping Indian Road
Oceanside, 92057

I105-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I106 MCDOWELL, WILLIAM (4)

Comment Letter I106

From: Wmcd01@sbcglobal.net <Wmcd01@sbcglobal.net>
Sent: Monday, August 13, 2018 8:35 AM
To: City Council <Council@ci.oceanside.ca.us>
Cc: John Mullen <JMullen@ci.oceanside.ca.us>
Subject: NRF APPLICATION FOR DEVELOPMENT AGREEMENT

I have reviewed the subject application from the North River Farms Project for a Development Agreement that provides vesting rights to develop and maintain the property. I am concerned that there may be an effort by the City Council to "fast-track" the approval process that does not conform to the requirements of the Oceanside Zoning Ordinance, particularly Articles 17 and 44.

Widespread support for the SOAR Initiative has been demonstrated by the successful effort to get on the ballot in November 2018 and there is great interest among the voters in how this Development Agreement is handled.

To reiterate the key points:

1. Vesting of rights to integral would forever impact the citizens of Oceanside with the loss of agricultural acreage and provide another precedent for high-density, sprawl development with huge financial and environmental costs. And potentially deny the Oceanside voters the right to vote on the project.
2. The Oceanside City Council could have adopted the SOAR Initiative in May 2018 after the signatures on the petition had been certified or called a special election, instead you decided to delay until the November 6th, 2018 ballot. Courts will not favor such transparent manipulation of the Ballot Initiative Process.

Please consider.

William W. McDowell
921 Sleeping Indian Road
Oceanside, CA 92057

cc
J. Mullen

I106-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I107 HOWE, WILLIAM (1)

Comment Letter I107

Robert Dmohowski

From: bruce howe <zumaque42@yahoo.com>
Sent: Tuesday, September 04, 2018 8:00 PM
To: Robert Dmohowski
Cc: City Council
Subject: NORTH RIVER FARMS DRAFT EIR

Follow Up Flag: Follow up
Flag Status: Flagged

GROWTH INDUCEMENT

This project is not located in a Smart Growth Area. The site is not needed to satisfy the City's housing demand.

When other DEVELOPERS see \$50,000,000 can be made from less than 200 acres of land it will be the first of many developments and a PRECEDENT will have been set. An area that now has about 400 residents will add 2000 residents with the North River Farms Project and over 30,000 residents will be the end result.

Does Oceanside have the Public Services for this population increase?

I107-1

I107-2

Respectfully,

William Howe
686 Sleeping Indian Road

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I108 HOWE, WILLIAM (2)

Comment Letter I108

Robert Dmohowski

From: bruce howe <zumaque42@yahoo.com>
Sent: Tuesday, September 04, 2018 8:21 PM
To: Robert Dmohowski
Cc: City Council
Subject: NORTH RIVER FARMS DRAFT EIR

Follow Up Flag: Follow up
Flag Status: Flagged

PUBLIC SAFETY

No New Fire Station. Current response times don't meet standards.

After my home burned in Rancho Santa Fe in the 2007 wildfires, I evacuated to my So Morro Hills home only to be forced to evacuate again. The Lilac Fire in December 2017 came within a mile of my property and we were evacuated several days. Sleeping Indian Road in front of my house was congested and evacuation was overly slow for current residents. One car broke through the adjacent tomato field fence and crossed my property to reach Sleeping Indian Road attempting to reach his stranded parents and evacuate them from the fire.

To add this development, increased population, and traffic is highly irresponsible and endangers current and future residents.

Respectfully,

William Howe
686 Sleeping Indian Road

I108-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I109 HOWE, WILLIAM (3)

Comment Letter I109

Robert Dmohowski

From: bruce howe <zumaque42@yahoo.com>
Sent: Tuesday, September 04, 2018 8:44 PM
To: Robert Dmohowski
Cc: City Council
Subject: NORTH RIVER FARMS DRAFT EIR

Follow Up Flag: Follow up
Flag Status: Flagged

TRAFFIC, CIRCULATION and CONGESTION

Current traffic on North River Road backs up over a mile during peak commuter traffic heading east to reach Highway 76. The primary roads within South Morro Hills are used by farm equipment such as tractors, spray rigs, harvest trucks, and buses for worker transportation. I don't see new residents being patient if stuck behind a tractor moving from one field to another.

The proposed mitigation measures do little to compensate for the increased traffic that will be generated. They certainly don't address the needs for future development which will occur.

I109-1

Respectfully,

William Howe
686 Sleeping Indian Road

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I110 HOWE, WILLIAM (4)

Comment Letter I110

Robert Dmohowski

From: bruce howe <zumaque42@yahoo.com>
Sent: Wednesday, September 05, 2018 7:08 AM
To: Robert Dmohowski
Cc: City Council
Subject: NORTH RIVER FARMS DRAFT EIR/DEVELOPMENT AGREEMENT

Follow Up Flag: Follow up
Flag Status: Flagged

PHASING OF IMPROVEMENTS

I am concerned this project will have a NEGATIVE FISCAL IMPACT on the CITY. The "SURPLUS" which does not adequately address needed PUBLIC SAFETY improvements, TRANSPORTATION and TRAFFIC issues needed or the PUBLIC SERVICES such as water and sewer is dependent on a Boutique Hotel and Commercial Space which are not likely to be built.

I110-1

If the COMMERCIAL VILLAGE CORE is not built the other residents in the City of Oceanside will end up FUNDING services and improvements for NORTH RIVER FARMS.

I recommend the developer be required to build the HOTEL and COMMERCIAL spaces prior to any RESIDENTIAL being built.

I110-2

If not willing to do this, the Developer should be required to POST A BOND to cover the projected TOT for the HOTEL and the projected SALES TAX to be generated by the COMMERCIAL until it is constructed and open for business.

Respectfully,

William Howe
686 Sleeping Indian Road

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I111 RANSOM, AL AND CATHIE

Comment Letter I111

Mr. Dmohowski
Associate Planner in charge collecting comments on NRFs EIR
City of Oceanside
Planning Division
Development Services Department
760.435.3563
rdmohowski@ci.oceanside.ca.us

Dear Mr. Dmohowski,

My husband and I are the owners of Paradise Falls, which is a popular wedding and special event venue located at the corner of Wilshire Road and North River Road.

Over the past year, we have met with Ninia that represents the North River Farms development and at first, were hopeful that they would listen to our concerns but as time has passed, it is evident that our opinions did not matter to them along with the negative impact they would have to our business.

Thus, the reason for this letter. First may I begin that we are business people and are not in any way anti-growth but, there is a point where excessive development would be detrimental to the last pristine farm area located within the boundaries of Oceanside. The NRF proposed 689 homes and 100+ room hotel is outrageous in scope. I drive to work everyday to Paradise Falls and North River Road is already a traffic nightmare during the rush hour of early morning and after 4PM. To give you an idea, it has taken me as much as 45 minutes to travel the 2.5 miles from our business to Hwy 76. The proposed widening of North River as explained to me by Ninia of NRF will be a two lane with center lane ending at Sleeping Indian. This proposed road improvement will be worse than ever creating quite the bottle neck and then further that by adding over 1,000 residents to the equation and the answer is quite evident.

Our next concern which was a hot topic but has died down over time is fire evacuation. It was only 9 months ago that we and the residents from Fallbrook and Bonsall were in the path of the "Lilac Fire" under mandatory evacuation. I am sure during your public hearings you have heard about the horror stories about traffic at a standstill as flames were visible heading in our direction. It would only be prudent planning that this issue is addressed and, depending on the density approved, it would be forward thinking in installing a bridge across the San Luis Rey River to Melrose or another nearby road. As the roads exist today and by adding over 1,000 residents, not to mention the 100+ room hotel with guests and personnel, we would have mass panic and chaos as the residents would have even a more difficult time of evacuating the area.

As for an impact to our business, I have stated repeatedly to NRF that their dwelling units are far too close to our venue as we are a permitted outdoor venue allowing us to stay open until 11PM, I for see a problem with homes built too close to us, will bring forth noise complaints. We are very respectful of our decibel allowance but knowing how some homeowners are, I only see a constant battle between a some of these

I111-1

I111-2

I111-3

I111-4

APPENDIX T0 (Continued)

future households and ourselves. NRF proposed moving their homes away from us from Wilshire Road about 50' but that certainly is not enough to make a difference. Early on, Ninia said NRF would add this as a disclosure to their sales agreement but I liken it to homes that were built in the flight path of Palomar Airport. Yes, it was disclosed but the never-ending complaints continue even though the homes came years later than the airport.

I111-4
Cont.

We are in strong support of Oceanside Agri-Tourism and see NRF as a direct conflict to the Oceanside AgriVision plan. We may be on board to support NRF if and only if, they reduce their density to about half the amount of homes they are proposing. I think the community would be much better served if we insisted on 200' setbacks from the road with vineyard or some type of leased farmland fronting the North River Road and Wilshire Road. We think the "Holiday Inn" type hotel is very much out of character and feel that the City should instead encourage B&B's, cabins and perhaps a boutique hotel under 25 rooms but nothing on the scale of 100 units. Quite frankly, I believe this hotel was put on the proposed development to show ghost revenue to the City of Oceanside in the way of room occupancy tax. I would like to see an occupancy study that would support such a large hotel in our area.

I111-5

In closing, the City of Oceanside has a great, onetime opportunity to implement their Agri-Tourism vision as this is a crucial time to make prudent decisions on density and usage for years to come. If not, this wonderful vision will not come to reality.

Respectfully,

Col. Al Ransom (USMC Ret) and Mrs. Cathie Ransom
Paradise Falls Wedding and Special Event Venue
190 Wilshire Road
Oceanside, CA 92057
760-533-8860 (Cathie's cell)

APPENDIX T0 (Continued)

I112 BRAGEN, MARK

Comment Letter I112

From: mark bragen <bragen@sbcglobal.net>
Sent: Wednesday, September 05, 2018 9:02 PM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: north east oceanside development

Sir,
I am against high and medium density housing development in the South Moro Hills in Oceanside. Traffic on Highway 76, College and other roads are highly congested with no plans for improvement. North River road is two lane road not appropriate for high density traffic. There are no acceptable infrastructure plans compatible with medium or high density housing development in South Moro Hills. Quality of life is the top priority, not additional development. Oceanside should maintain its agricultural land use designation for South Moro Hills.

Regards
Oceanside Resident
Mark Bragen
zip 92057
tel 669-263-1065
Sent from my iPad

I112-1
I112-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I113 FERRER, SUSIE

Comment Letter I113

From: Susie Ferrer <susie.ferrer1@gmail.com>
Sent: Wednesday, September 05, 2018 4:51 PM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: North River Farms

Dear Sir : As a resident of Morrow Hills I have to let you know that it will be to the detriment of this area if you add thousands of residents. This is a farming community and the infrastructure and culture of this place will be destroyed by this planned development. Please consider your impact on making decisions on other peoples lives. Please do not be in favor of this idea.

I113-1

With Gratitude,
Susie Ferrer
949-275-1965
susie.ferrer1@gmail.com

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I114 JOHNSON, LAURA

Comment Letter I114

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

From: Laura Johnson <laurajohnson10@gmail.com>
Sent: Wednesday, September 05, 2018 5:25 PM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: North River Farms Draft EIR

Hello,

I am in the neighborhood of North River road. The traffic today is so unbelievable that the traffic on college and hwy 76 is bumper to bumper. It takes me 25 min to go a mile to my home in the evening. With the addition of thousands of people and no additional access to North River Road it will be grid lock. Until the infrastructure is improved and constructed, not one house should be built in that area. A suggestion would be opening North Melrose from N. River Rd. through the existing North Melrose to North Santa Fe. That would allow traffic to exit down College Blvd., N. River Rd. to Douglas, and North Melrose to the south. Please reconsider building homes in this area.

I114-1

I114-2

Sent from my iPad

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I115 HOWE, WILLIAM (5)

Comment Letter I115

Robert Dmohowski

From: bruce howe <zumaque42@yahoo.com>
Sent: Thursday, September 06, 2018 9:56 AM
To: City Council
Cc: Robert Dmohowski
Subject: NORTH RIVER FARMS DRAFT EIR/DEVELOPMENT AGREEMENT

Follow Up Flag: Follow up
Flag Status: Flagged

NORTH RIVER FARMS/INTEGRAL DEVELOPMENT/ MANCHESTER is a powerful and extremely wealthy entity. Their hired consultants have outspent your City Staff many times over. This is understandable given the huge profit this project would generate. Your staff has done an excellent job.

I ask the City Council to listen to the people of Oceanside
General Population
Planning Commission
So Morro Hills Assoc
Various HOAs in the area
Agritourism Strategic Plan
Visit Oceanside

and to the City Staff
Planning Division
Public Safety Officials
Traffic Engineer

The 3500 acres in South Morro Hills is a unique and beautiful asset unique to Oceanside. Once the General Plan and Zoning is amended there is no turning back. These changes are being driven in a Rushed Fashion by a Huge Developer without adequate research and investigation. The changes are inconsistent with current General Plan policies. A comprehensive Land Use Study should be done and the long term Vision Plan completed by the So Morro Hills Assoc.

I urge the City Council to proceed with Recycled Water projects, TIER 1 AGRITOURISM ACTIVITIES, and other projects to enhance and preserve this beautiful area.

That will be a stronger legacy than being known as the Council who commenced turning this beautiful area into a densely populated area with inadequate Public Safety, Traffic Congestion, and a drain on the resources and finances for all of the residents of Oceanside.

Respectfully,

William Howe
686 Sleeping Indian Road

I115-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I116 WEBER, BILL AND CHARLENE

Comment Letter I116

Robert Dmohowski

From: bill weber <billwcpi@gmail.com>
Sent: Thursday, September 06, 2018 8:48 AM
To: Robert Dmohowski
Subject: North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Dmohowski,

I am not in favor of the North River Farms Project. I do not believe that it is in keeping with the rural neighborhood in which it is being proposed. I would be more in favor of 2.5 acre thru 5 acre single family home parcels. Much less impact on environment, public services, traffic. We are Fallbrook residents and are very concerned about the potential for traffic increase on Sleeping Indian Road. Sleeping Indian Road (Fallbrook portion) is privately held and maintained by the Morro Hills Community and is not in a condition to handle any more traffic, nor is it fair to the residents of this rural area to impact us with any more traffic. We moved here for a rural lifestyle and I believe that we are entitled to the preservation of this lifestyle and that it should not be impacted by the greed of developers. If this project goes thru how will the City of Oceanside prevent traffic from traveling on the Fallbrook portion of Sleeping Indian Road?

I116-1

I116-2

Thank You
Bill and Charlene Weber
4842 Sleeping Indian Road
Fallbrook CA
Cell 714 335 5065

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I117 PALACIOS, CARMEN

Comment Letter I117

*Carmen Palacios
1014 Bellingham Dr.
Oceanside, CA 92057*

September 6, 2018

Mr. Rob Dmohowski
Associate Planner
CITY OF OCEANSIDE
300 N. Coast Highway
Oceanside, CA 92054

RE: COMMENTS ON THE NORTH RIVER FARMS DRAFT EIR

Dear Mr. Dmohowski:

My family and I live in the Arrowood community. We have reviewed the Draft EIR (DEIR) for the North River Farms development project, and offer the following comments.

1. The project proposes an over 10-fold increase in number of residential units allowed per the General Plan and Zoning. It also proposes commercial and recreational uses which are not presently allowed. These features would be quite the financial benefit for the applicant. We do not see corresponding benefits accruing to the City from the project. Logic would dictate that eliminating 170 acres of agricultural land and replacing it with residential, commercial and streets does not contribute to "sustainability", which the DEIR touts in the Project Description.

I117-1

2. The DEIR indicates that significant traffic impacts, including failing and near-failing LOS presently exist at intersections on College Boulevard, Vandergrift Boulevard and North River Road. My family experiences these poor LOS daily. We have been waiting for the Melrose connection across the San Luis Rey River to be constructed so this link can relieve some of these poor levels of service. The traffic improvements (mitigation measures) identified in the DEIR are minimal (re-striping two existing intersections, and adding a median), and will have little to no benefit on the traffic circulation in the area. Common sense dictates that adding 8,000 ADT (over the existing zoning projection) into an area with several failing LOS intersections would qualify as poor planning, even with some re-striping. The EIR should draw this same conclusion. And the question comes to our mind; if the re-striping is so helpful, why doesn't the City re-stripe next week, and not wait for a developer to add 8,000 ADT? Re-striping is not that expensive.

I117-2

I117-3

3. We are surprised to read in the DEIR that the City is considering dropping the Melrose link across the river due to environmental concerns and lack of funding in the City's Traffic Fee programs. This would be a poor decision. Cities put bridges across rivers, creeks and other environmentally-constrained areas regularly. Mitigation will be required, but the state and federal permits for needed public improvements are not difficult to achieve. Oceanside should set their sights a little higher. The DEIR should conclude that the 10-fold increase in residential density on the outskirts of the City, without adequate circulation improvements provided, can be characterized as premature development. A 10-fold increase in density (plus commercial and recreational) should be considered only after the Melrose extension is constructed.

I117-4

APPENDIX T0 (Continued)

Thank you for the opportunity to comment on the DEIR.

Sincerely,



Carmen M. Palacios
1014 Bellingham Dr.
Oceanside, CA 92057

APPENDIX T0 (Continued)

I118 DUNBECK, DAVID

Comment Letter I118

Robert Dmohowski

From: David Dunbeck <ddunbeck@cox.net>
Sent: Thursday, September 06, 2018 11:41 AM
To: Robert Dmohowski
Subject: North River Project

Follow Up Flag: Follow up
Flag Status: Flagged

I am writing to voice my opposition to the proposed North River Road Project in Morro Hills. We do not have the roads to support the additional traffic that will impact 76. 76 is already a "parking lot" much of the day. The last fire was an eye opener. If we needed a sudden evacuation, the gridlock would have caused hours of delays. Living in Jeffries Ranch, where the city has neglected their responsibility of providing us necessary escape routes, has accentuated my concerns for ANY ADDITIONAL traffic added to 76 due to new housing. Additionally, the South Morro Hills area should be kept a rural, farming community adding a unique area to Oceanside not found anywhere coastal where we have overbuilt to the demands of developers. It's time to say NO to big money and YES to the citizens of Oceanside.

David Dunbeck
5723 Shetland Court
Oceanside, CA 92057

Sent from my iPhone

I118-1

I118-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I119 CEFOLA, ELAINE (2)

Comment Letter I119

Robert Dmohowski

From: Elaine <ecefola7@att.net>
Sent: Thursday, September 06, 2018 1:03 PM
To: Robert Dmohowski
Subject: 9/6/18 re NRF from Elaine Cefola, Oside homeowner

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Mr. Dmohowski,
I got notice about the North River Farms Development via Next Door online from Ms. Louise Balma.

For the record, I am totally against any and all housing developments for numerous reasons:

1. Not enough water to sustain more people
2. Possibility of needing more schools in the Vista School District.
3. Infrastructure costs
4. High fire risk due to dry brush as the forecast is expected to have increasing temperatures every summers now.
5. Increased traffic
6. Car pollution into the atmosphere.
7. Glutting the market for existing homeowners
8. Route 76 cannot handle more traffic even with over or under passes to be built.
9. Increase in crime and drug trafficking is inevitable.

This project and any other housing developments should be NO votes by this Council and Planners.

Increase commercial tenants instead in Ocean Ranch, Oceanside Parks. Work to get employers here instead. Amazon is going to University City - we just lost that!

I119-1

I119-2

APPENDIX T0 (Continued)

The city and Chamber of Commerce should work on possible companies relocating to Oceanside only and some affordable housing by the bus or rail line. Look at the numbers of current ridership. The North - South corridor for transit may be more attractive vs the East-West rail line to nowhere.

| 1119-3
|

Elaine Cefola
Saran Ct.
Oceanside, CA 92056

I120 GILLIGAN, JANE (1)

Comment Letter I120

Robert Dmohowski

From: Gilligan Groves <gilligangroves@gmail.com>
Sent: Friday, September 07, 2018 10:23 AM
To: Robert Dmohowski
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

I write in protest with regards to the NRF project. The impacts on the community will be irreversible if this project goes forward. The location is inappropriate and unsupported by the infrastructure but even more troubling is the risk to public safety in light of the recent fire evacuation we all experienced in December. Most likely it will not be our last evacuation. South Morro

I120-1

I120-2

Hills and our agritourism vision
we've worked on with the city of
Oceanside with will be
tainted. Simply said it's the wrong
location and
not worth the risk.
Sincerely,
Jane Gilligan

↑
I120-2
Cont.
↓

APPENDIX T0 (Continued)

I121 DOMERCQ, JENIENE

Comment Letter I121

Robert Dmohowski

From: Jenieneneen <jenieneneen@gmail.com>
Sent: Thursday, September 06, 2018 2:00 PM
To: Robert Dmohowski
Subject: South Morro Hills Project

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon, I am emailing you to let you know I am very OPPOSED to the South Morro Hills project. I have lived in the area for 27 years and this agricultural area is vital! Going from 400 some residents to over 2500 is outlandish! Stop this from happening, don't ruin our beautiful rural area! I will be watching and involved in anyway I can to STOP this.

I121-1

Jeniene Domercq

[760.214.7854](tel:760.214.7854)



[Website](#) | [Facebook](#) | [Twitter](#)

"We are visionaries passionately committed to growth; aligned to provide exemplary patient care through leading and developing our teams while protecting the integrity of our partnerships."

PROFESSIONALISM - PASSION - INNOVATION -
COLLABORATION - SUPPORTIVENESS - INTEGRITY

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I122 OBRITE, YVONNE (1)

Comment Letter I122

Robert Dmohowski

From: Yvonne Obrite <yvonneobrite@gmail.com>
Sent: Thursday, September 06, 2018 6:22 PM
To: Robert Dmohowski
Subject: North River Farms

After reading the Environment Impact Report for North River Farms I am against the rezoning of Morro Hills for this project for the following reasons.

1. The EIR designates where the project will tie into the city's water system. IT DOES NOT stipulated the environmental impact of 689 more dwellings on the city's water system during drought conditions.
2. The EIR designates several flood drains incorporated into the project to drain into the San Luis Rey River. This river is already at maximum during high rain seasons. Increase paving of the Morro Hills area will contribute considerably to the river level at maximum rain seasons. (Ironic as it seems we have a lack of water and water drainage issues, which are NOT addressed in the EIR)
3. Traffic issues surrounding and throughout the project are addressed. However, connecting corridors connecting to the project are not addressed. Have you tried to turn left, or right for that matter, on south Santa Fe lately ?
4. The EIR states that the Fire Department will have to approve this project. How can they approve it when last December was a nightmare in the area. Imagine adding 689 dwellings, not to mention inhabitants, and Agri tourists when a fire breaks out!
5. Lastly, it is my understanding that the planning department advised the city council NOT to approve the zoning change due to the impact on the surrounding communities. If this is true, how can the city council, in good conscience, even consider the proposal.

I122-1
I122-2
I122-3
I122-4
I122-5
I122-6

Yvonne Obrite
40 year resident of Oceanside

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I123 OBRITE, YVONNE (2)

Comment Letter I123

Robert Dmohowski

From: Yvonne Obrite <yvonneobrite@gmail.com>
Sent: Thursday, September 06, 2018 7:17 PM
To: Robert Dmohowski
Subject: addendum to previous North River Farms EIR

This statement is on our neighborhood blog:

The following is directly from the staff report: City Staff has reviewed the proposed North River Farms Planned Development and has found the project to pose significant and unavoidable impacts to our entire cities population, housing, traffic, public safety and transportation. Which can't be mitigated.

This environmental impact report is a sham. It doesn't address any impact to the environment, it is more like a brochure to paint a pretty picture. Once they get this zoning change, they won't stop until every inch of the city is developed.

Yvonne Obrite

I123-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I124 NAMAULEG, BERNADETTE

Comment Letter I124

From: Bernadette Namauleg <namauleg@gmail.com>
Sent: Saturday, September 08, 2018 1:46 PM
To: Robert Dmohowski
Subject: North River Farm Project

Follow Up Flag: Follow up
Flag Status: Flagged

For ALL those who vote please be aware that I am AGAINST this project being approved.

I124-1

Please realize that our last wild fire event (the Lilac Fire) proves that developing another remote area for higher density puts so many more in lives in danger.

Evacuations of our area proved difficult. We were forced to use the undeveloped road ways. Adding more on our already overcrowded roadways will make it even more difficult and in danger more lives.

I124-2

If it were not for our brave firefighters putting up a stance at the High School the Lilac Fire could have advanced through the river bed all the way to the Pacific Ocean. This is not my opinion but it was heard on the local public news from our own Fire Chief. Approving this project after that statement might open the city up for lawsuits if or when it happens. The lost of structures and human life is at great cost.

There is many reasons to not accept this project but for me first and foremost it would be the lack of infrastructure to support those individuals who would live there. Roads allow for minimal vehicle transportation (and no public transportation being available), the lack of public services (fire, police or ambulance.) The hundreds of cars and individuals whom would live there will add to the current congestion on College Blvd, 75, North Santa Fe and North River Rd.

Do not vote yes for this project without first attempting to drive the area during peak traffic. Currently you can wait 3-4 light cycles before getting through College and or North Santa Fe. Once you experience the drive remember you will be adding hundreds more vehicles in that area. Do not forget to image that traffic and then it's affect on an impend disaster event.

I124-3

Vote AGAINST this dangerous project. Work to improve our current safety and infrastructure first.

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I125 MCCLENDON, BOB

Comment Letter I125

From: Bob McClendon <macgmtinc@aol.com>
Sent: Saturday, September 08, 2018 1:52 PM
To: Robert Dmohowski
Subject: North River Farms (SCH # 2017111069)

Follow Up Flag: Follow up
Flag Status: Flagged

Given the lack of predictable/sustainable water supply plus the huge need for more agriculture/carbon offset PLUS the already crowded North River road, I strongly oppose the proposed development!

Bob McClendon
macgmtinc@aol.com

I125-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I126 HANSON, DIANE

Comment Letter I126

From: Diane Hanson <ddshanson2@gmail.com>
Sent: Friday, September 07, 2018 9:55 PM
To: Robert Dmohowski
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

To best serve the interest of the community - leave the land as it is. This is the last farm land in Oceanside. We need to keep it and establish Agritourism on it. A big developer cannot do a better job of that then the current farmers. A housing development would cut into the land and just be the start of more housing development - which Oceanside doesn't need. We need businesses. Those proposed small businesses shown in this project do not offer enough jobs and none that would pay very well. Don't be short sighted. Think of the over all good. Don't just jump at the cash. The current citizens of Oceanside would have to subsidize the infrastructure to this project and that is not fair. The traffic would be awful. These SOAR programs have worked in other California communities such as Ventura County. They are an example of what can be done - for the good. We do not have to reinvent the wheel. We just follow what others have already done. We can use that format to develop the existing North River area without resorting to damaging the land. PLEASE LEAVE THE FARM LAND - FARM LAND.

I126-1

I126-2

I126-3

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I127 VANDRUFF, DIANE (2)

Comment Letter I127

From: Diane Vandruff <dianeisdibo@yahoo.com>
Sent: Sunday, September 09, 2018 3:51 PM
To: Robert Dmohowski
Subject: North River Farms EIR

Follow Up Flag: Follow up
Flag Status: Flagged

Please STOP the development of the North River Farms area!

Develop the old drive in theater areas off Faucet Rd and industrial area around Benet Rd.

Sent from my iPhone

I127-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

I128 GILLIGAN, JANE (2)

Comment Letter I128

From: Gilligan Groves <gilligangroves@gmail.com>
Sent: Monday, September 10, 2018 9:36 AM
To: Robert Dmohowski
Subject: Comments on the NRFs DEIR

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

I write in protest with regards to the NRF project. The impacts on the community will be irreversible if this project goes forward. The location is inappropriate and unsupported by the infrastructure but even more troubling is the risk to public safety in light of the recent fire evacuation we all experienced in December. Most likely it will not be our last evacuation. South Morro

I128-1

I128-2

Hills and our agritourism vision
we've worked on with the city of
Oceanside with will be
tainted. Simply said it's the wrong
location and
not worth the risk.
Sincerely,
Jane Gilligan

↑
1128-2
Cont.
↓

APPENDIX T0 (Continued)

I129 MCDONALD, JASON

Comment Letter I129

From: Jason McDonald <jasonmcdonald0804@gmail.com>
Sent: Friday, September 07, 2018 6:07 PM
To: Robert Dmohowski
Subject: N River Farms Draft EIR

Follow Up Flag: Follow up
Flag Status: Flagged

Simply stated the North River Farms development will greatly and permanently negatively impact traffic and congestion and air pollution and noise pollution. The negative impact on safety is also a clear concern for all surrounding residents in the event of an evacuation.

I129-1
I129-2

The city should not allow development on North River Road until a long-term plan and improvement is approved to create a major artery for traffic relief and evacuation process. If the city never intends to allow a 4 or 6 lane improvement to North River Road then they should never consider new development of the surrounding land. If the improvement is approved to make that an artery then the future developers should pay for the improvements and complete them before new mass construction is allowed.

I129-3

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I130 HUGHES, PATRICIA

Comment Letter I130

From: Patte Hughes <pattehughes@gmail.com>
Sent: Monday, September 10, 2018 9:47 AM
To: Robert Dmohowski
Subject: Comments on the NRFs DEIR

The possibility of the proposed project (NRF) and its impacts on the community will be irreversible if you allow this project to go forward. Besides the obvious that its location is inappropriate and unsupported by the infrastructure the risk to public safety is insurmountable. Will you be prepared to defend your stance when, not if, the next fire rages through Fallbrook, Bonsall and then into Oceanside and families are challenged with the choice of whether to stay in their home because they fear being trapped in their car due to the already overburdened escape routes or take a chance and attempt to flee? Is it worth it to have the back of Integral? A serious look at the realities of this matter may be appropriate before it's too late.

I130-1

I130-2

Sincerely,

Patricia Hughes

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I131 HAAS, SANDRA

Comment Letter I131

From: sanhaas1@yahoo.com
Sent: Saturday, September 08, 2018 2:37 AM
To: Robert Dmohowski
Cc: Louise Balma; Sandy Miller
Subject: Impact North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

I am contacting you on behalf of my family and myself concerning the increase in traffic on North River Road. We have lived on Via Puerta Del Sol for 27 years. We have witnessed the increase of traffic over the years on our narrow two lane, winding roads but the traffic in the last two years seems to have doubled. There are times of the day that the traffic is backed up on North River Road all the way from 76, over 1/2 mile, blocking our exit to the East and is bumper to bumper traffic going West. It's already TERRIBLE without North River Farms having been built which would effectively change the zoning code paving the way for more high density building.

I131-1

Many of our small "country" roads have only one way in and one way out, without taking back roads that take you in the wrong direction. We have been evacuated twice in the last ten years from the wild fires. The Lilac Fire in December destroyed half of our property and burned several neighbors homes to the ground. Many have horses and other animals that required trailering to evacuate which necessitates extra time and unblocked roads.

I131-2

North River Road has become a highway for people who want to take a shorter way to Hyw. 76. Before changing the zoning and allowing high density building, fix the infrastructure and roads that are already broken and neglected.

I131-3

Does our entire City have to be concrete? Just building on every 2 1/2 acres, as zoned, would be a nightmare.

I131-4

Please! We need your help!

Sincerely,
Sandra Haas

Sent from my iPhone
Sandra Haas

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I132 DUBOIS, STEVE (2)

Comment Letter I132

From: stevedubois1@aol.com
Sent: Saturday, September 08, 2018 8:08 AM
To: Robert Dmohowski

Follow Up Flag: Follow up
Flag Status: Flagged

Rob:

Consider Measure EE. Our schools are over crowded now and the citizens of Oceanside are being asked to pass a measure to build a new school requiring additional property taxes.

I will be voting NO on Measure EE as we pay enough taxes already and don't want more.

I don't see where the North River Farms project will help this situation in any way.

Regards,

Steve duBois
1133 Village Dr Oceanside Ca,
92057

I132-1

I132-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I133 STEIN, SUSAN

Comment Letter I133

From: vintagewhine.ss@gmail.com
Sent: Sunday, September 09, 2018 3:52 AM
To: Robert Dmohowski
Subject: North River Farms Development Project

Follow Up Flag: Follow up
Flag Status: Flagged

I'm concerned about traffic and safety due to high-density and mass new construction caused by the proposed North River Farms development project. My husband and I vehemently oppose this project and will carefully follow its progress to determine how we will vote in the next City of Oceanside election.

I133-1

Susan Stein
111 Taft Circle
Oceanside, 92057

Sent from my iPhone

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I134 STEELE, DANIELLE (2)

Comment Letter I134

From: danielle steele <danisteele01@gmail.com>
Sent: Monday, September 10, 2018 5:30 PM
To: Robert Dmohowski
Subject: Environmental Impact Report

Follow Up Flag: Follow up
Flag Status: Flagged

Rob Dmohowski

I live one block away from this proposed housing project. The traffic congestion at North River/Vandegrift/College is outrageous all ready. There is no way those stop lights can handle more cars on the road. And North River Rd, it is a small country road that has a lot of open space where we see tons of wildlife. My backyard I see so many varieties of birds and if you decide to build I don't know what will happen to all of the birds habitats. Come and sit one evening along North River and you will see tons of swallows. They live in the riverbed. They do not go to San Juan Capistrano anymore because they pushed them out with building. And lastly My water bill is \$200 a month what is it going to be like when we have more houses to suck up the water supply?

I134-1

I134-2

I134-3

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I135 SCHWARZE, SHANNA (2)

Comment Letter I135

From: Shanna Schwarze <shannaschwarze@gmail.com>
Sent: Thursday, August 09, 2018 4:32 PM
To: Robert Dmohowski
Subject: EIR comments - North River Farms

Dear Mr. Dmohowski,

As a resident of Oceanside, I would like to offer my comments on the EIR for the proposed North River Farms development. I have grave concerns over a few items mentioned:

1. Table ES-4 Lists "Fire Protection Services" as a "Significant Impact" with "no feasible mitigation"

o In California, Fire Season now lasts all year. There are currently 15 ongoing fires {as of August 9th}.

Only 9 months ago, the same region of this proposed development was a clogged artery for evacuations. The scope of this development risks 1000s of lives, homes, and livestock.

o In addition, the initial build out would block this pathway during the heart of fire season. It seems downright reckless to inflict this on that area.

<https://www.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?BlobID=47802>

2. I am also concerned about the variety of proposals with no definite plan. Anywhere from 61 homes on 2.5 acres, to 400+ homes, including retail and a boutique hotel. This is not South Oceanside or downtown. A boutique hotel does not make sense and wreaks havoc on a fragile eco-system.

3. In chapter 4 it says this development requires a re-zoning of the land. "4.3.4 - the project could also impact air quality against the SANDAG amount." This doesn't seem right without a city wide vote.

<https://www.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?BlobID=47807>

4. Furthermore, Oceanside's own General Plan says this about local agriculture: *As stated therein, the agriculture industry in the City is valued at approximately \$12 million annually. This accounts for approximately 10% of the County's agricultural output.*

A lively agricultural region is vital to the overall Oceanside community and offers other options besides a housing development.

Oceanside is a great place to live and only getting better. I am not against building but would urge the City to develop a thoughtful, safe, and economically relevant plan for the future.

Thank you for the opportunity to submit my dissension.

*Sincerely,
Shanna Schwarze
Oceanside Resident*

I135-1

I135-2

I135-3

I135-4

I135-5

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I136 BONILLA, ADRIANNA

Comment Letter I136

From: Adrianna Bonilla <mat@firesuite.net>
Sent: Tuesday, September 11, 2018 8:34 PM
To: City Council
Subject: A message from Adrianna



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I136-1

Adrianna Bonilla

Adrianna.bonilla@gmail.com

92054

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I137 BOONE, CONNIE

Comment Letter I137

From: pondgrass@aol.com
Sent: Thursday, September 13, 2018 12:56 PM
To: Robert Dmohowski
Subject: North River Farms Project

Please, do NOT approve the North River Farms Project.
Thank you,
Connie Boone
125 Ellery St
Oceanside, CA

I137-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I138 MASTRO, DEBBIE (2)

Comment Letter I138

From: Debbie Mastro <bunnee321@aol.com>
Sent: Wednesday, September 12, 2018 11:34 PM
To: rdmohowski@ci.oceanside.ca.us
Subject: north river farms project

Putting dense housing where it was not planned will only increase traffic congestion, add to the serious air quality problem already facing our region, exacerbate demands on limited water supply, and increase emergency response times, among many other issues of concern. Additionally, the developer has not committed to providing on-site affordable housing. Please do NOT approve the North River Farms project. Fire season is upon us...did we learn nothing from the Lilac fire? Please do not go forward with this project.

I138-1

Thank you,
Debbie Mastro

~ BE THE CHANGE YOU WISH TO SEE IN THE WORLD ~

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I139 M NGUYEN, JESSICA

Comment Letter I139

From: jessica nguyen <mat@firesuite.net>
Sent: Thursday, September 13, 2018 10:25 AM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from jessica



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I139-1

jessica nguyen

jessicanguyendotcom@gmail.com

92128

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I140 BALMA, LOUISE

Comment Letter I140

9/13/2018

City of Oceanside
300 N. Coast Highway, Oceanside, CA 92054
Rob Dmohowski, Associate Planner
e-mail to rdmohowski@ci.oceanside.ca.us

Re: Comments on THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE NORTH RIVER FARMS PLANNED DEVELOPMENT PLAN

Dear Rob;
The following are my concerns with the DEIR for North River Farms Planned
Development.

1. Loss of Prime Agricultural land

Our General Plan states pretty strongly that residential development shall be permitted provided that such development does not interfere with existing agricultural operation. Land use compatibility is of primary importance to agricultural area with the conflicts potentially leading to the economic non-viability of the agricultural area. North River Farms is a subdivision and in no way respects the agricultural area on which is proposes to build as well as respecting the surrounding agricultural land surrounding it.

I140-1

The DEIR states that the entire project site is considered to represent a significant agricultural resource based on the LESA Model, impacts to our agricultural resources are significant and the mitigation method is to buy credits in the San Diego County PACE program which doesn't provide any real land on which to grow it just puts money in a fund to be used however the county sees fit. This is Oceanside Prime agricultural land, producing food for our city, state and nation. We can't allow this to happen, I understand Oceanside doesn't have a mitigation bank YET, but as we continue to develop our Oceanside AgriVision plan this is something the city needs to create. There are plenty of parcels in South Morro Hills that can be preserved as agricultural land. In fact directly to the east of this project sits a landowner on an old Dairy on the south side of North River Road, that does nothing with his/her land, I'm sure with the right purchase agreement and offer he or she would sell. Oceanside needs to develop a mitigation bank for our city and NRF's can wait and can buy credits then. In the event the City adopts an effective agricultural conservation or mitigation program prior to the applicant filing its first application for a grading permit, the applicant shall be required to purchase mitigation credits from an adopted program. We have the most agricultural land west of the 15 freeway in the entire county of San Diego we can not lose one acre of it without replacing it within our city.

I140-2

APPENDIX T0 (Continued)

2. Loss of Cultural Resources

Its very sad to know that back in 1991 and 2001 in the boulder outcroppings on this land that significant milling features, milling sticks, felsite, andesite, chert, and chalcedony flakes were identified and over time and unprotected this cultural area has been somewhat diminished. BUT there is still milling features in the boulders and a milling slab on the southern edge of this site. Pushing this off as not significant just brushes aside the City of Oceanside's cultural resources. In the City's General Plan it states:

The City shall encourage the acquisition, restoration, and/or maintenance of significant cultural resources by private organizations.

3.2C: Cultural resources that must remain in-situ to preserve their significance shall be preserved intact and interpretive signage and protection shall be provided by project developers. And goes further to state

An archeological survey report shall be prepared by a Society of Professional Archaeologists certified archaeologist for a project proposed for grading or development if any of the following conditions are met:

1. The project site is near or overlooks a water body (creek, stream, lake, freshwater lagoon); When these milling stones were used by the native Americans who were preparing food the river flowed by this site.
2. The project site includes large boulders. The Milling features are within the large boulders on site.
3. The project site is located within a half-mile of Mission San Luis Rey. Although it's a bit further they Native Americans who lived here were part of the Mission.

We need to not let these cultural resources be lost to a development that will turn it into a neighborhood park and continue the loss over time of the remains of Native American Women who worked tirelessly prepared food for their family's for years on this site. I'm sure once grading begins with as much dirt as NRF plans on removing they will find much more. Taking a shoves and digging a few holes around the site is not enough to discover what potentially lies below the surface. Integral needs to do a better investigation of what is located on this land provide a report by a certified Archaeologist and preserve what little is left of this part of Oceanside culture before any entitlements are issued.

1140-3

APPENDIX T0 (Continued)

3. Issues to be resolved by the lead agency section ES.8.

Whether there are other mitigation measures or alternative that should be considered for the proposed project besides those identifies. I request there are other alternatives that need to be studied.

We have been working for 10 years on the South Morro Hills Vision Plan, now Oceanside AgriVision, we are at the threshold of adopting the first tier to the AgriVision plan for agritourism opportunities. We need Integral to provide an alternative for the AgriVision Plan, there is enough detail and direction to have them study this alternative and I would respectfully ask that you as a lead agency require this. We have all worked very long and hard on the plan not to be recognized as an alternative. I would also request the alternative to have a range of preserved agricultural land at 75%, 65% and 50%, with the balance of each being developed.

1140-4

4. Economic Considerations

In the Executive Summary ES.2.3 the list of objectives for the project states in item #12. Include a mix of land uses and facilities that will maintain a positive fiscal impact on the City of Oceanside's general fund.

I found nothing to support the statements of economic consideration in the DEIR. Using a 100-room hotel, makers spaces and the commercial uses with no back up as to if these will be viable, justification as to how they will be viable, and just what expected revenue the city can receive in the future is something of serious concern. 689 houses and 2300 new residents will put a severe drain on the City of Oceanside existing public services and general fund. Will these economic benefiting uses ever be built? What protections are there that they will get built? What are the economic benefits on the farm revenue, and how will the farm sustain itself? What assurances are there that the HOA homeowners will vote no to the farm and yes to more houses in the future? What qualifications beside an education does the consultant have to back up the farm revenue and the business plan? The City of San Juan Capistrano currently supports the Ecology Center, is the City of Oceanside going to be asked someday to do the same? We need Integral to provide more information on these concerns and just how this all will work. This just seems like lipstick on the pig.

1140-5

APPENDIX T0 (Continued)

5. Aesthetics

In the Executive Summary ES.2.3 the list of objectives for the project states in item #1 Provide visual and functional compatibility with adjacent residential neighborhoods, other nearby land uses, development, and natural features.

The views and vistas that the DEIR deemed as un-significant is far from the truth. Oceanside is unique in that it offers its citizens the views and vistas of the ocean to the west with farming to the northeast. I know of no one who lives in our city that doesn't appreciate the view of the agricultural fields as they drive through South Morro Hills or as they look across the San Luis Rey Valley. Most have no idea that these beautiful vistas are in Oceanside; they thought it must be Fallbrook. The DEIR did no study of the views across the SLR Valley and what most see off in the distance the Sleeping Indian lying down with the fields of agriculture surrounding him as he sleeps. In the DEIR they used images that benefit their position to again come to the conclusion as the loss of these views and vistas are un-significant.

1140-6

I know many neighbors of SMH say as they drive east on North River Road after they pass Stallion Drive and enter farmland on both sides of the road feel relaxed, take a deep breath, and smell the farm as they drive past it, they are home in the beautiful Agricultural Region of Oceanside. I'm sure others feel the same but I can only speak of those I talk to and myself to understand this to be a reality. The DEIR brushes this off again as not significant. In our Oceanside AgriVision Plan we recognized this as important and pushed the housing behind the farming with rows of orchard crops surrounding the clustered housing, no fences, and provide a farm mosaic, so when you drive in and through South Morro Hills you drive through a rural, farming feel not a landscaped right of way, a fence with a bunch of houses behind it that you only see the second floor and roof tops of. They speak of great architecture but they don't show it to the people who drive through NRF, it's like every other subdivision. NRF needs to provide more studies from more vistas before we pass this on as not significant

1140-7

6 Traffic

With all I read in the DEIR on Traffic and Circulation it states after mitigation measures it is still significant and unavoidable and Public Safety and Fire Safety has no feasible mitigation. Both of these we as a city and a neighborhood live with daily to add a project of this size with the impacts it will contribute to the quality of life and the safety of life this project should not be entitled.

1140-8

We need to have Integral further study how NRF's as well as future projects that are allowed within the current zoning in South Morro Hills could possibly be entitled. If our roads and bridges are failing with NRF's then how can the additional 1100 homes at 2.5 zoning ever pass through. Our general plan and circulation plan allow for this planned growth by including certain elements into

APPENDIX T0 (Continued)

the cities circulation plan. The Melrose Bridge was planned to allow for the future development of South Morro Hills, but it did not plan for 689 additional houses and 2300 additional people living in the area. The developer needs to include circulation, traffic and public safety into its studies with the Melrose Bridge. Entitlement of this project should only happen with a plan to build this bridge, whether the bridge is paid for by the developer, the city, a bond issued to the citizens, a toll assessed, or combination of any of these, the bridge needs to be built. At the very least an environmental study needs to be conducted and the developer should built an Low Water Crossing to be used for emergency access only through the river.

Thank you for this opportunity to comment on this project.

Sincerely;

Louise Balma

745 Sleeping Indian road, Oceanside, South Morro Hills

↑
1140-8
Cont.

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I141 HADLEY, MICHAEL

Comment Letter I141

From: Michael Hadley <matt@firesuite.net>
Sent: Wednesday, September 12, 2018 3:11 PM
To: City Council
Subject: A message from Michael



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I141-1

Michael Hadley

mdhadley@me.com

92130

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I142 GEORGE, SUSAN

Comment Letter I142

From: Susan George <susan.george@mac.com>
Sent: Wednesday, September 12, 2018 4:12 PM
To: Robert Dmohowski
Subject: Say NO to North River Farms Project

Dear Mr Dmohowski,

Please do not approve the North River Farms project. As a landowner near the proposed project, I have grave concerns about how so many new residences would impact evacuation efforts during future wildfires, which we all know are becoming more frequent and severe. The inability to evacuate people quickly could cause the loss of lives.

I 1142-1

Additionally, high density housing is a very poor use of valuable farm land.

I 1142-2

Thanks!

Susan George
South Morro Hills resident

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I143 LUEBE, SYDNE

Comment Letter 143

Robert Dmohowski

From: Sydne Luebe <surfskisydne@yahoo.com>
Sent: Thursday, September 13, 2018 11:21 AM
To: Robert Dmohowski; southmorrohills@gmail.com
Subject: North River Farms DEIR comment

To whom it may concern,

I have been in the Oceanside area for 39 years. My father built the house we now own in South Morro Hills. I believe that the City of Oceanside should preserve and protect what little agriculture remains within their boundaries. A minimum of 2.5 acers should be maintained and any high density housing should be south and west of College Boulevard.

I143-1

If this Development is allowed to proceed it will only increase the traffic, congestion, noise, pollution and sprawl of Oceanside. The nature of the Oceanside will be lost forever. The time has come to say that high density housing needs to remain nearby transportation corridors and other congested areas, not move it outward to increase drain on city resources.

I143-2

I believe Oceanside has the unique opportunity to maintain a Agritourism area within its boundaries and keep a diversified economy and identity within the coastal area of San Diego County. Oceanside could maintain a culturally diversified identity not found along the coast of southern California any more. There is nothing to be gained by becoming cookie cutter communities such as San Clemente or Capistrano which are wall to wall houses, strip malls, and freeways.

I143-3

The Lilac Fire in December of 2017 highlighted just how agriculture can aid a city. Without the fields that had been turned under the fire could have burned additional structures and spread further. The other glaring issue pointed out by the fire, was that Sleeping Indian Road was the only way out for many people commuting to Temecula, and points Northward. This road was bumper to bumper cars and it was the only route to the north between 78 and the Ortega Highway. We could not get out until the evacuation order was given and traffic was cut off by North River Road.

I143-4

Please maintain the minimum lot size and allow agriculture to thrive within the city of Oceanside. Our community has a long history of community participation on city boards and commissions. This community and area is an integral asset to the city and surrounding area.

I143-5

We are the last house in the City of Oceanside. Sydne Luebe 6552 Indian Hill Way, Fallbrook , CA 92028.

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I144 METCALFE, ALISON

Comment Letter I144

From: Alison Metcalfe <matt@firesuite.net>
Sent: Tuesday, August 14, 2018 1:32 PM
To: City Council <Council@ci.oceanside.ca.us>; info@northriverfarms.com
Subject: A message from Alison



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I144-1

Alison Metcalfe

aroiasmetcalfe@gmail.com

92081

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I145 BRANDT, ARIANNE

Comment Letter I145

From: Arianne Brandt <matt@firesuite.net>
Sent: Wednesday, September 05, 2018 9:45 AM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Arianne



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I145-1

Arianne Brandt

aribrandt3@gmail.com

92011

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I146 COLEMAN, BRETT

Comment Letter I146

From: Brett Coleman <matt@firesuite.net>
Sent: Thursday, August 16, 2018 4:49 PM
To: City Council; info@northriverfarms.com
Subject: A message from Brett



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I146-1

Brett Coleman

colebrettman@yahoo.com

85087

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I147 BELL, CHERI (2)

Comment Letter I147

From: Cheri Bell <matt@firesuite.net>
Sent: Tuesday, September 04, 2018 3:01 PM
To: City Council
Subject: A message from Cheri



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I147-1

Cheri Bell

Cheri_bell@cox.net

92057

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I148 VOSS, EMMA

Comment Letter I148

From: matt@firesuite.net
Sent: Thursday, August 09, 2018 2:03 PM
To: City Council; info@northriverfarms.com
Subject: New submission from North River Farms



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I148-1

Emma Voss

emma@organikseo.com

1100 Garden View Road #322

92024

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I149 BURKE, GREG

Comment Letter I149

From: Greg Burke <matt@fresuite.net>
Date: September 8, 2018 at 10:22:34 AM PDT
To: <Council@ci.oceanside.ca.us>
Subject: A message from Greg



Dear Mayor and Honorable Council Members:

I do not support North River Farms because I totally against any more development.
Oceanside is already too congested.
Please do not allow this development to pass.

I149-1

Greg Burke

gburke4402@yahoo.com

92057

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I150 CASE, JEROME

Comment Letter I150

From: Jerome Case <matt@firesuite.net>
Sent: Tuesday, September 11, 2018 8:34 PM
To: City Council
Subject: A message from Jerome



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I150-1

Jerome Case

Eromej@hotmail.com

92054

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I151 BELL, JOE

Comment Letter I151

From: Joe Bell <matt@firesuite.net>
Sent: Tuesday, September 04, 2018 3:02 PM
To: City Council
Subject: A message from Joe



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I151-1

Joe Bell

Lbujoe@yahoo.com

92057

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I152 HESTER, NAKISHA

Comment Letter I152

From: Nakisha Hester <naisha@firesuite.net>
Sent: Monday, August 27, 2018 9:29 AM
To: City Council
Subject: A message from Nakisha



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I152-1

Nakisha Hester

nakishahester@gmail.com

92003

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I153 LEFKOWITZ, NATASHA

Comment Letter I153

From: Natasha Lefkowitz <matt@firesuite.net>
Sent: Tuesday, September 11, 2018 7:26 PM
To: City Council
Subject: A message from Natasha



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I153-1

Natasha Lefkowitz

doclefkowitz@yahoo.com

92024

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I154 BARBATO, NICOLE

Comment Letter I154

From: Nicole Barbato <matt@firesuite.net>
Sent: Monday, September 10, 2018 12:09 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I154-1

Nicole Barbato

nbarbat89@gmail.com

92008

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I155 LOPEZ, NICOLE

Comment Letter I155

From: Nicole Lopez <matt@firesuite.net>
Sent: Thursday, August 16, 2018 4:39 PM
To: City Council; info@northriverfarms.com
Subject: A message from Nicole



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I155-1

Nicole Lopez

nicoleblopez@icloud.com

92056

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I156 MORRIS, REBECCA

Comment Letter I156

From: Rebecca Morris <rebecca@firesuite.net>
Sent: Tuesday, September 04, 2018 6:44 PM
To: City Council
Subject: A message from Rebecca



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I156-1

Rebecca Morris

lickmanart@earthlink.net

92009

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I157 RODRIGUEZ, SUZANNE

Comment Letter I157

From: Suzanne Rodriguez <matt@firesuite.net>
Sent: Wednesday, August 15, 2018 11:06 AM
To: City Council <Council@ci.oceanside.ca.us>; info@northriverfarms.com
Subject: A message from Suzanne



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I157-1

Suzanne Rodriguez

rodriguez_suzanne@hotmail.com

92058

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I158 LARKIN, TAMMY

Comment Letter I158

From: Tammy Larkin <matt@firesuite.net>
Sent: Tuesday, September 11, 2018 3:16 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Tammy



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I158-1

Tammy Larkin

TCCQ@aol.com

92082



APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I159 SUSTACHEK, WENDY

Comment Letter I159

From: Wendy Sustachek <matt@firesuite.net>
Sent: Thursday, August 30, 2018 6:07 AM
To: City Council <Council@ci.oceanside.ca.us>
Subject: A message from Wendy



Dear Mayor and Honorable Council Members:

I support North River Farms because I am excited to see these creative ideas come to Oceanside. Farming, education, and creating as part of a broader community is something that appeals to me. This is a place that I would either visit or live. Infrastructure, improvements and planning are part of the future of Oceanside and I think North River Farms has done a good job of looking toward the future.

I159-1

Wendy Sustachek

Wendysus@cox.net

92056

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I160 KORNACHER, SUSAN

Comment Letter I160

From: s.kornbacher@yahoo.com <s.kornbacher@yahoo.com>
Sent: Monday, September 17, 2018 10:47 AM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: Response to DEIR - North River Farms

Dear Sir,

I am writing to voice my objection to the proposed development North River Farms / Integral in Oceanside. As a resident, I am appalled that the City Council would even continue to consider this development after the Planning Department advised the council, quite rightly, NOT to approve the zoning change due to the impact on surrounding communities. Per the staff report: "City Staff has reviewed the proposed North River Farms Planned Development and has found the project to pose significant and unavoidable impacts to our entire cities population, housing, traffic, public safety and transportation. Which can't be mitigated."

I160-1

The addition of almost 700 new dwellings would amount to a likely increase of 1400 more cars (as most families have two cars) on already overburdened, rural two lane roads in the area. The traffic would be even more of a nightmare and dangerous. The EIR does nothing to help improve the infrastructure that would be necessary on corridors connecting to the project and would put all residents in the area in danger, especially in the event of another fire evacuation, as it notes, "that increase in traffic will be significant and unavoidable." Their plan to mitigate that is to purchase cap and trade carbon vouchers from the state which does nothing to mediate the problem! The EIR also does not address the environmental impact on the water system, especially during drought conditions, or the fact that the local schools and first responders are not prepared to adequately respond to this density, again, putting the community at risk. If the development were to be approved, it is very likely Oceanside residents will become responsible for mitigating these problems which will ensure higher taxes on all of us, rather than the developer.

I160-2

APPENDIX T0 (Continued)

It is incredibly disheartening and disappointing that the City Council would disregard the findings of their own Planning Department and put constituents at risk in favor of wealthy developers. Voters will remember that in November.

1160-3

Sincerely,
Oceanside resident
Susan Kombacher
Wilshire Rd.
Fallbrook, Ca

APPENDIX T0 (Continued)

I161 RIGG, ALICE

Comment Letter I161

From: Alice <alice_rigg@hotmail.com>
Sent: Sunday, September 16, 2018 6:57 PM
To: Robert Dmohowski
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

For 30 years I have lived in the area of Oceanside where Integral Communities hopes to build North River Farms and in all that time we have not seen such an unsuitable proposal. Common sense tells us that it is completely wrong for the area and the draft EIR substantiates this. Traffic on 76 and all the connecting streets is already at maximum capacity and there is no feasible mitigation. My first concern is the increased traffic and a close second is the clogged streets that will seriously delay emergency vehicles from reaching the area.

I161-1

What motivated me to write and express my opinions is the fact that some city council members want to approve a zoning change in the face of negative recommendations from the city planning department and over 10,000+ residents who are opposed to the development. It is not right for the council to act without regard to residents' input and city staff recommendations.

I161-2

At this point in 2018 we do not want any backroom deals or promises, or choosing wrong over right, that will not be tolerated. We do want to allow the citizens to speak at the ballot box.

Alice Rigg
5335 Raspberry Way

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I162 SIDHU, ASHA AMBER

Comment Letter I162

From: Asha Sidhu <4.a.a.sidhu@gmail.com>
Sent: Friday, September 14, 2018 4:13 PM
To: Robert Dmohowski
Subject: The North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Rob Dmohowski,

The current unchecked dense overdevelopment of Rural Oceanside is completely changing the nature of our community. We moved to this area due to its rural nature.
The North River Farms Project would be detrimental in every way - increased traffic congestion, noise, air quality (adding an additional 100,000 metric tons of greenhouse gases per year), environmental degradation, stress to our natural resources, not to mention waste management, sewage and additional overuse of a limited water supply. Additionally the public safety element must be considered with ever decreasing funds for emergency services and increasing fires and natural disasters.
This project will only enrich the developers and current owners at the expense of our community and future generations.

I162-1

I162-2

Best Regards,

Asha Amber Sidhu
4635 Allende Ave.
Oceanside, CA 92057

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I163 MILLER, DENNEY

Comment Letter I163

From: denney miller <sanden7@sbcglobal.net>
Sent: Sunday, September 16, 2018 7:48 AM
To: Robert Dmohowski; sanden miller
Subject: NRF DEIR comments

Follow Up Flag: Follow up
Flag Status: Flagged

September 16, 2018

Mr. Rob Dmohowski
Associate Planner
City of Oceanside

Dear Mr. Dmohowski:

My wife and I are Oceanside homeowners of 20 years.

As I again review this Draft EIR for North River Farms, it seems unbelievable that the leaders of our fine City would approve this project.

The severe environmental impacts not only on this project but of similar projects which would most certainly follow this one through the entire Morro Hills area are appalling to consider.

Major severe negative impacts include but are not limited to:

Traffic Congestion

Emergency Evacuation from future fires and disasters

Cost to residents of future unpaid liabilities for city services: schools, police, fire protection, water, sewer, roads, etc.

Air pollution and climate change.

Negative Impact on San Luis Rey River and downstream to Pacific Ocean.

Negative Impact on wildlife and natural habitat.

Because of these extremely severe impacts and many more, please help ensure that this extremely harmful project will never be approved.

Thank you for your professional service on behalf of all current and future Oceanside residents.

I163-1

I163-2

APPENDIX T0 (Continued)

Sincerely yours,

Denney Miller, 6105 Las Tunas Drive, Oceanside

APPENDIX T0 (Continued)

I164 MARTINEK, DENNIS

Comment Letter I164

DENNIS MARTINEK, Ph.D.
1537 Sleeping Indian Road

Fallbrook, California 92028

September 10, 2018

Mr. Robert Dmohowski
Oceanside Planning Department
300 N. Coast Highway
Oceanside, CA 92054

RE: Consideration of issues in preparation of the EIR for North River Farms

Dear Mr. Dmohowski:

In preparing the Environmental Impact Report for the North River Farms project, I am concerned with the project's consistency with the following General Plan and Public Safety Issues:

1. **Public Safety – Flooding.** A significant portion of the project is located in the San Luis Rey River Flood Plain. The specific area in which the project is proposed has a history of severe flooding. In the past 40 years, the river has overflowed its banks at least three times and destroyed portions of North River Road, Melba Bishop Park, and the homes on Stallion Drive. As the Public Safety Element of the City's general Plan points out, "The severity of damage is often directly proportional to the intensity and density of development and the proximity of the development to the hazard source." Any development south of North River Road is in direct conflict with the Public Safety Element policies.
2. **Public Safety – Fire.** The risk of fire is another safety issue that would be increased by the development of North River Farms. As the Public Safety Element states, "The danger of fire is probably the most severe hazard faced by residents of Oceanside." It also identifies one of the primary factors that contribute to the brushfire threat is development pattern, "Brush fire hazards are high when in proximity to residential development." In view of the recent dangers posed by the Lilac fire and the extreme difficulty in evacuating the area because of the limitations of North River Road, Vandegrift, and College Boulevard, careful analysis should be made of the risks to the community by the significant increase in traffic caused by North River Farms.

I164-1

I164-2

Phone / Fax 760 - 941 - 1876 ~ Cell: 760 - 519 - 1875

APPENDIX T0 (Continued)

3. **Balanced Land Use** – The project conflicts with the General Plan Policy identifying the long-term value of having a balance of land uses including agricultural. This balance promotes a more efficient community. It encourages “smart growth” and lessens the impact on the circulation system. Local agriculture is a benefit to the community that should not be ignored. The project will result in prime agricultural land being lost forever. 1164-3
4. **Land Use Compatibility** – The proposed project conflicts with the General Plan’s policy of avoiding conflicts in use. Placing a high density residential project in an agricultural zone creates problems for farmers trying to carry out their business. The San Diego Farm Bureau recommends a minimum 300-foot buffer between farms and other uses. The North River Farms project will result in conflict between farmers and home owners. 1164-4
5. **Conservation of Agricultural Lands** – The City’s Land Use Element (Section 2.5) states a policy, “To identify, conserve and enhance Oceanside’s agricultural areas.” The land impacted by this project is designated as “prime” agricultural land. A comprehensive analysis of the impacts of the loss of Oceanside’s farmland should be required. Appendix G of CEQA Land Evaluation and Site Assessment (LESA) provides a systematic method of determining impacts to prime agricultural land. The DEIR should include a comprehensive LESA analysis of the impacts of converting this prime agricultural land to other uses. This analysis needs to be done both for the project, and for the cumulative impacts of potentially converting all of the agricultural land in South Morro Hills to other uses. 1164-5

I appreciate your work in making Oceanside a better place to live.

Sincerely,

Dennis Martinek

Dennis Martinek, Ph.D.

Phone / Fax 760 - 941 - 1876 ~ Cell: 760 - 519 - 1875

APPENDIX T0 (Continued)

I165 OCHS, MARK (2)

Comment Letter I165

Honorable City Council,

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

I165-1

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

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

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

I165-2

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

I165-3

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

I165-4

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

I165-5

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

I165-6

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

I165-7

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

I165-8

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

I165-9

APPENDIX T0 (Continued)

9. Figure 4.4-1 fails to show the regional wildlife corridor links between the San Luis Rey River and "other habitat areas inside or outside of the city."	I165-10
10. Failure to evaluate potential impacts on migratory birds associated with the San Luis Rey (SLR) River.	I165-11
11. Inadequate testing of soil and water for hazardous materials.	I165-12
12. Emergency evacuation plan arbitrarily limited the analysis to focus on the project site and within the site on the HOA.	I165-13
13. Evaluation required for the Evacuation impacts of piecemeal roadway widening.	I165-14
14. Cost of required additional flood control systems not identified or evaluated.	I165-15
15. Analysis fails to evaluate compliance with Regional Housing Needs Assessment (RHNA) allocations by income level.	I165-16
16. Evacuation impacts of piecemeal roadway widening.	I165-17
17. Failure to mitigate for projected water supply shortfall.	I165-18
18. Oceanside Unified School District will not have sufficient staff and facilities to serve the proposed project if it were approved.	I165-19
I would think that Integral Management would bring the City of Oceanside a much more compelling proposal that would offer much more.	I165-20
A. Traffic impacts heading east from the project have been completely ignored. North river road should be improved, widened until reaching Highway 76. "Cal Trans endeavors that any direct and cumulative impacts to the state highway system be eliminated or reduced to a level of insignificance pursuant to CEQA and NEPA standards" As identified in the Department of Transportation response to the Draft E.I.R. "21 additional intersections are impacted and not disclosed and 20 existing Draft E.I.R. impact findings that require correction, revision, substantiation or justification.	I165-21
B. Infrastructure improvements (Sewer, reclaimed water, storm drain and offsite improvements) should be solely the burden of the developer without the suggested repayment by future downstream development.	I165-22
C. The "Community Facility District" should be solely the burden of the Developer. Insurance and management of this district should remain a compelling offer for the Development agreement consideration.	I165-23
D. Affordable housing should be included in the project. No consideration should be given to alternative options.	I165-24
E. Green House Gases should be mitigated by design and reduced by building limitations, not solely by purchase of carbon off sets.	I165-25

APPENDIX T0 (Continued)

- F. Agricultural mitigation should not be achieved through purchase of agricultural conservation easements in other county locations. Mitigation should replace the 176.64 acres within the Oceanside city limits.
- G. Native America artifacts have been completely overlooked in the Draft E.I.R and movement forward should include oversight by a third party during and excavation, to identify any and all artifacts discovered, and a plan be in place to relocate all artifacts to a designated location onsite in respect for and in tribute to all tribal ancestry.
- H. Vested rights duration. If the Development agreement is considered viable, It should be limited to a maximum term of five years, as projected by the developer in the estimated timeline to complete the phasing. Going beyond this duration restricts the City of Oceanside of it right to review all projects completely with unrestricted discretion.

| 1165-26

| 1165-27

| 1165-2

Again, please deny the request for any movement forward on the proposed draft E.I.R. or Development Agreement. To do otherwise would be premature and may/will have negative long-term consequences regarding this project as well as similar submittals to City staff and Council.

| 1165-29

Respectfully,

Mark Ochs

Sleeping Indian Road

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I166 MILLER, SANDY

Comment Letter I166

Robert Dmohowski

From: denney miller <sanden7@sbcglobal.net>
Sent: Friday, September 14, 2018 12:05 PM
To: Robert Dmohowski
Subject: North River Farms EIR

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

I am writing to you because I believe the North River Farms project will negatively impact the environment because:

The traffic is already horrible on North River Road without adding more vehicles on the road. The impact of the residents trying to get on North river Road and waiting in traffic at 76 or Vandegrift sometimes takes three lights before we can turn onto either highway in the morning and afternoon. It took forever to leave when we had to evacuate from the Lilac Fire last December. God forbid if we have another fire with an additional projected 2300 persons it will be impossible with the way the roads are now.

I166-1

Right now Oceanside does not have the Public Services for this population increase. The propose intense development will require increased fire protection, police services, and schools.

I166-2

The City of Oceanside has designated areas for building new homes. This area is not located in a Smart Growth Area. If precious farmland is destroyed our environment will be negatively affected now and for future generations let's keep the quality of Oceanside for the residents already residing here.

I166-3

I166-4

Sandy Miller
760 726-7190

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I167 HARVEY, SEAN

Comment Letter I167

Robert Dmohowski

From: Sean Harvey <smharvey27@gmail.com>
Sent: Sunday, September 16, 2018 8:24 PM
To: Robert Dmohowski
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Robert

My family has lived in Oceanside for 16 years at 1004 Manteca Dr. We drive North River 4 days a week to go to class in Bonsall. The traffic on Vandergrift blvd is horrible and accidents often coming out of base. We really can't afford more development and traffic in the area.

I167-1

The fires coming down the river corridor are a real threat and have had serious burns twice in several years. Our ability to flee this corner of Oceanside in the 3 mandatory evacuations we have had from wildfires since 2003 has been terribly stressful. What I am saying is more homes won't help and will strain the resources and the roads and our safety.

I167-2

Please kindly consider my comments as part of the EIR process.

Thank you!
Sean Harvey

Sent from my mobile phone.

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I168 OCHS, SHARON SINCLAIR (2)

Comment Letter I168

Robert Dmohowski

From: sharon ochs <ochsmail@sbcglobal.net>
Sent: Monday, September 17, 2018 10:01 AM
To: Robert Dmohowski
Subject: REJECT Draft EIR and DENY Proposed Development Agreement presented by NRF

Dear Oceanside City Council,

My family has owned our home on 3 acres in South Morro Hills since 1984. We have supported our community and paid our taxes with commitment for the best of Oceanside and our neighborhood.

Now, my husband and I, both 4th generation Californians, have to present ourselves before our own City Council to remind them that our Oceanside homeowner interests should be considered above an out of state developer desiring to change a longtime Zoning status to build over 10 times the current legal zoning limit on North River Road.

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

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

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

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

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

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

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

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

For over a year you have heard from Oceanside homeowners within a large radius of this proposed disaster. All have reminded you of the traffic nightmare, impact on community services and overall physical danger that YOU WILL be placing on your own Oceanside community. This national developer does not and will not live here.

In our 60 plus years, my husband and I can count over ten California communities we have lived in. While all good, NEVER, have we lived in a community with the level of pure joy that we and our neighbors share about living here in Oceanside's South Morro Hills. It is beautiful, and we are working hard to develop ways to share it with others through our Agritourism efforts.

APPENDIX T0 (Continued)

AND this is despite the high cost of water and electricity and the fear of being trapped escaping a fire on only two-lane roads that includes North River Road.

| 1168-10

You must recognize the NRF project is all crisp marketing and trigger themes designed to get people outside of our neighborhood area to support.

There is no support from the Oceanside neighborhood that will be forever changed.

| 1168-11

I hope this letter will help you to further consider the impact of this project on the community you serve, and I ask that you **Reject the Draft E.I.R. and DENY the PROPOSED Development Agreement presented by North River Farms.**

Sharon Sinclair Ochs
Sleeping Indian Road

Sent from [Mail](#) for Windows 10

APPENDIX T0 (Continued)

I169 TILLINGHAST, STEVE AND HEIDI

Comment Letter I169

Robert Dmohowski

From: Heidi Tillinghast: <shillinghast@icloud.com>
Sent: Sunday, September 16, 2018 7:59 AM
To: Robert Dmohowski
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Dear City of Oceanside,

I and my family oppose this project. Thank you.

Steve & Heidi Tillinghast

I169-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

1170 JOHNSON, ROBERT H.

Comment Letter I170

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

From: Bob Johnson <bajabob450@hotmail.com>
Sent: Monday, September 17, 2018 2:10 PM
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Cc: Amber Sidhu <lostarts@cox.net>
Subject: North River Farms Project

Dear Rob Dmohowski,

I want to add my voice to the growing opposition for more development in Oceanside. We moved to this area due to its rural nature.

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

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

Sincerely,

Robert H. Johnson
4635 Allende Avenue
Oceanside, CA 92057

I170-1
I170-2
I170-3

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I171 JOHNSON, KRISTEN

Comment Letter I171

From: Kristen Johnson <digsblues@gmail.com>
Sent: Monday, September 17, 2018 12:48 PM
To: City Council <Council@ci.oceanside.ca.us>
Subject: Comments on North River Farms DEIR

After reading the whole NRF DEIR, here are a few of my objections. The developer needs to provide space and financing for a new fire station. Oceanside doesn't have the money and the fact that 90% of the residents there will be waiting longer than 5 minutes for emergency services is not acceptable.

I171-1

The area is not near public transportation or a smart growth location no matter what the developer does. Our general plan says new homes are needed in infill areas and we don't need more sprawl.

I171-2

The project will cause more traffic congestion on several of the roads, including North River Road, Douglas Drive, and Vandegrift making the commute and especially evacuations more dangerous.

I171-3

The developer has not committed to building any workforce or affordable housing in the whole project. We cannot keep giving developers General Plan amendments, entitlements and zoning changes in exchange for very little. The City doesn't have the money for their share of the road and bridge improvements, so it will be years to get those.

I171-4

I171-5

The agricultural portion of the project is too small, just enough to pretend it's not just another housing project.

I171-6

The developer needs to reach out to the citizens, residents and farmers to make many necessary changes, not just hope for a vote from 3 Council members.

I171-7

The developer is offering \$40 million in infrastructure and the area needs closer to 100

I171-8

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I172 JOHNSON, JONI

Comment Letter I172

From: Joan Johnson <jonijohnson@mac.com>
Date: September 17, 2018 at 4:36:04 PM PDT
To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>
Subject: DEIR Comments North River Farms Draft Environmental Impact Report

To: City of Oceanside: Mayor, City Council, and Development Service
Department
300 North Coast Highway
Oceanside, CA 92054

RE: Draft DEIR Adequacy Comments on the North River Farms Planned Development Plans Page 1 of 2
SCH# 2017111269

From: Joni Johnson
1057 Village Drive
Oceanside, CA 92057

In brief, the above DEIR document is NOT ADEQUATE because:

1- It neither contains or answers the spoken and written DEIR comments made at the second public meeting including mine which will need to be incorporated and answered for a completed adequate DEIR

↓
I172-1
↓

APPENDIX T0 (Continued)

2- The DEIR does NOT adequately mitigate fire protection deficits, public services like adequate public schools and parks, fire and medical services, and safe emergency evacuation for the General Public based on the project's stresses on the infrastructure systems.

↑
1172-1
Cont.

MITIGATION MEASURES Needed:

In more detail, THE CITY OF OCEANSIDE MUST DO THE FOLLOWING BEFORE ALLOWING FURTHER

DEVELOPMENT IN THE FOOTHILLS AND AG LAND, INCLUDING FOR THIS PROJECT :

A. MAINTAIN THE GENERAL PLAN'S ZONING Requirement for "AGRICULTURAL -SCENIC PARK OVERLAY" ON THE OVER 60 ACRE

PROJECT SITE LOCATED SOUTH OF RIVER ROAD. THIS WILL BE AN INVALUABLE SCENIC BENEFIT TO THE ENTIRE AREA, PROTECTS THE VISUAL VIEW OF THE SAN LUIS REY RIVER AND GUAJOME PARK AND IS NOT ADEQUATELY REPLACED BY THEIR OFFER OF 10.2 ACRES DIVIDED INTO 4 NEIGHBORHOOD POCKET PARKS VARYING IN SIZE ANYWHERE FROM 1.8 to 3.6 ACRES AND EACH TOO TINY FOR THE GENERAL PUBLIC including INADEQUATE PUBLIC PARKING

↑
1172-2

THIS IS NOT A GAIN OF 0.34 ACRE PARK BASED ON THE 9.86 Acre FIGURE PROJECT REQUIREMENT, BUT

INSTEAD AN ACTUAL LOSS OF OVER 50 ACRES OF SCENIC PARK FOR THE SURROUNDING COMMUNITY.

I MIGHT ALSO ADD IT'S ALSO "SLIGHT OF HAND MATH". WE ALL KNOW IN ORDER FOR INDUSTRY TO

LOCATE IN DESIRABLE COMMUNITIES, THEY WANT LOTS OF OPEN SPACE AND RECREATIONAL SPACE

FOR THEIR WORKERS- JUST LIKE WE, YOUR CONSTITUENTS DO!

ARE YOU CONTENT TO GIVE OVER 60 ACRES OF SCENIC PARK AWAY? Making any more parkland for Oceanside?

B. Utilize truly Smart growth sites. THIS PROJECT IS not smart growth because it is not a SANDAG conforming site.

↑
1172-3

C DEVELOP A FIRE PROTECTION ENGINEERING PLAN FOR OCEANSIDE to protect people, property and the environment. ACCORDING TO FIRE PROTECTION SPECIALISTS AND SCIENTISTS * PART OF THE

PROBLEM IS HOW HOUSES HAVE BEEN BUILT. TO BUILD IN A WAY THAT REDUCES FIRE DAMAGE, EXPERTS

SAY WE SHOULD BUILD HOUSES FARTHER APART (AG density of 2.5 Acres lots or larger would do that;

↑
1172-4
↓

APPENDIX T0 (Continued)

the project's 1 Acre lots do not compute to SMART GROWTH as far as good fire protection goes);

KEEP VEGETATION FROM TOUCHING HOUSES; PRUNE DRY VEGETATION; LEAVE A FIRE BREAK
AND CONSIDER THE FLAMMABILITY OF HOUSING MATERIALS LIKE ROOFING, SIDING, DUCTWORK, AND
SCREEN THE VENTING AREAS IN ATTICS, EAVES AND WALLS SO BURNING EMBERS CAN'T BLOW
INSIDE HOMES (CALFIRE determined THIS WAS A MAJOR FACTOR THAT CAUSED so much fire damage last year to Santa Rosa inside the city limits.)

I172-4
Cont.

D. DECLARE THE SAN JOAQUIN LUIS REY RIVER BOTTOM in Oceanside a severe fire threat BECAUSE THE
SANTA ANNA WINDS BLOWING RELENTLESSLY FROM THE MOUNTAINS TO OCEAN THROUGH THIS
RECESSED TOPIGRAPHICAL FEATURE CREATE A "BLOW TORCH EFFECT"(PER CAL FIRE DURING
COVERAGE OF THE LILAC FIRE) AND DEVELOP LAND USE LAWS THAT REDUCE DEVELOPMENT
NEARBY. (EXAMPLE: DO NOT ALLOW COMMERCIAL PROPERTIES OR DENSER HOUSING
ALONG THE RIVER BOTTOM AND USE FIRE PROTECTION ENGINEERING PLANS)

I172-5

p.2 of 2 Johnson DEIR Comments North River Fams DEIR

ALONG THE RIVER BOTTOM AND USE FIRE PROTECTION ENGINEERING PLANS)

THE TOPOGRAPHY (SAN LUIS REY RIVER,) DOMINANT WINDS (SANTA ANNAS) AND PLANT LIFE
CAN ALL DETERMINE THE CHANCES OF AN AREA FACING AN "EXTREME FIRE BEHAVIOR"
WHICH IS WHEN FLAMES ADVANCE FASTER THAN YOU CAN CONTROL THEM...LIKE THE LILAC FIRE.
THE CHANGE OF WEATHER AND CLIMATE ARE MAKING THE FIRE SEASON WORSE.

I172-6

E. DEVELOP FIRE EVACUATION PLANS FOR THE FOOTHILLS AND NEARBY AREAS (TO INCLUDE WIDENING THE BRIDGE ON
NORTH RIVER ROAD SO THAT TWO 4X4'S CAN DRIVE SIDE BY SIDE ON THE BRIDGE during evacuation.
HAVE SHERIFF, POLICE ALONG WITH FOOTHILL LOCALS AND THE CITY DEVELOP ROAD PLANS THAT CAN BE USED
AS TWO LANE TRAVEL IN ONE DIRECTION (OUT)AND ROADS THAT CAN POSSIBLY BE USED BY LOCALS AS 2- WAY

I172-7

APPENDIX T0 (Continued)

TRAFFIC (IN) IN ORDER TO EVACUATE TRAPPED PEOPLE AND ANIMALS , AND HAVE PUBLIC EDUCATION MEETINGS TO DISCUSS, DISTRIBUTE MAPS (IF NECESSARY, A MAP FEE CAN BE CHARGED).

ALSO DEVELOP A BROADER FIRE SHELTER PROGRAM WITHIN OCEANSIDE AND WITH NEIGHBORING COMMUNITIES

IN 2018 OVER 1,000,000 CALIFORNIA ACRES HAVE BURNED IN THE FIRST 9 MONTHS).

THESE 1,000,000 ACRES TELL YOU WHAT HAS BEEN TERMED "THE NEW NORMAL", BUT WHAT YOUR CONSTITUENTS DO NOT WANT IS FOR YOU TO CARRY ON DEVELOPMENT LIKE "NORMAL" APPROVING UNSAFE DEVELOPMENT THAT THREATENS TO WORSEN THE FIRE SITUATION FOR SURROUNDING NEIGHBORS AND THE COMMUNITY AS A WHOLE.

WILDFIRES DO NOT NEED TO BE SO DEVASTATING TO HUMAN LIFE AND PROPERTY. WE CAN MINIMIZE THE DAMAGE THROUGH THE APPLICATION OF SCIENCE AND THE ABILITY FOR PUBLICLY ELECTED OFFICIALS TO JUST SAY NO TO PROJECTS LIKE THIS ONE THAT:

1-REMOVE LARGE AREAS OF SCENIC PARK (+60 ACRES SOUTH OF RIVER ROAD) IN FAVOR OF A SCANT 10.2 ACRES OF 4 MINI PARKS

2-INCREASE DENSITY & CROWD HOUSES CLOSER TOGETHER IN AREAS WHERE THERE IS PROVEN FIRE DANGER AND FIRE SAFETY EVACUATION PROBLEMS

Or ones that

3- DO NOT USE ADEQUATE BUILDING MATERIALS/ PLANS to LIMIT FIRE DAMAGE/ SPREAD

* Albert Simeon, Professor at Worcester Polytechnic Institute, as written by Kristin Hugo in NEWSWEEK article, "Fires in California: How to stop the destruction and create Better Neighborhoods"

Thank you for allowing me to comment.

Sincerely,
Joni Johnson

↑
1172-7
Cont.
|
1172-8
|
1172-9
|
1172-10
↓

APPENDIX T0 (Continued)

On Sep 7, 2018, at 3:32 PM, Robert Dmohowski
<RDmohowski@ci.oceanside.ca.us> wrote:

**NOTICE OF EXTENSION
PUBLIC NOTICE OF THE AVAILABILITY
OF THE DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE NORTH RIVER FARMS PLANNED DEVELOPMENT
PLAN
(SCH # 2017111069)**

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I173 KELLY, CRISTEN

Comment Letter I173

From: Cristen Kelly <cakelly33@gmail.com>
Date: September 17, 2018 at 4:24:45 PM PDT
To: <rdmohowski@ci.oceanside.ca.us>
Subject: North River Farms Project

Dear Robert,

It is my understanding that the comment period for the North River Farms proposed development project closes today.

I'd like to Express my opposition to this project and the changing of the zoning of this area.

We do not have the infrastructure to support this kind of development
The schools aren't able to adequately support the additional population. We don't need more housing, we already have two dense communities being built that I have a feeling they are struggling to even get units sold on because of the price.

The area doesn't have the roads to support the additional traffic, it was a nightmare last December trying to get people out during the Lilac fire.

Who will pay for additional roads, water, sewer, schools?

Thank you,
Cristen Kelly

I173-1

I173-2

I173-3

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I174 LONG, JOSEPH W.

Comment Letter I174

From: Bill Long <longb@hotmail.com>
Date: September 17, 2018 at 3:44:54 PM PDT
To: "rdmohowski@ci.oceanside.ca.us" <rdmohowski@ci.oceanside.ca.us>
Subject: North River Farms Development

Hi Robert,

I would like to take this opportunity to register my concerns against the North Rivers Farms Development. It seems to me that Oceanside already faces infrastructure challenges regarding traffic and emergency services, and I would like to see those challenges addressed and resolved before we add more residents which will only exacerbate the problems we already face.

I174-1

Sincerely,

Joseph W. Long
1016 Gallery Drive
Oceanside, CA 92057
longb@hotmail.com
408-569-3940

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I175 MACIARIELLO, JAMES

Comment Letter I175

From: James Maciariello <james@masterworkimage.com>
Date: September 17, 2018 at 3:20:03 PM PDT
To: <rdmohowski@ci.oceanside.ca.us>
Subject: North River Farms Development

Greetings Mr. Dmohowski,

I'm certain you've heard many voices concerning the proposed South Morro Hills development, but I thought it important enough to add mine. I don't believe it's a good fit for our city at this time. Among ALL the issues of concern, I believe the future backlash against traffic and congestion alone would make any elected officials that approve this development wish that their term were up, ha! The 76 (West of North Santa Fe) is already maddeningly frustrating. I understand the challenging logistics, but it really does need to be a freeway. The large country road has served us well, but is now antiquated. The arteries branching off it providing access to Morro Hills are limited as well.

Thanks for your time and consideration Mr. Dmohowski. Have a good day.

James Maciariello
MASTERWORK IMAGE

† 949.351.3189
www.masterworkimage.com
james@masterworkimage.com

I175-1

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I176 NELSON, BOB

Comment Letter I176

From: Robert Nelson <robert.j.nelson52@gmail.com>
Date: September 17, 2018 at 4:55:49 PM PDT
To: <rdmohowski@ci.oceanside.ca.us>
Subject: North River Farms Development Project, Draft EIR Comments

Mr Dmohowski, Associate Planner

My comments are as follows;

1) I agree with the Planning Commission that the project is out of scale with the Community and will cause un-mitigated harm to the Community and should be rejected.

I176-1

2) The Melrose Drive Bridge that the Developer is proposing to complete a feasibility study for has been rejected multiple times in the past by Fish & Wildlife and others due to the harm to native species and the river and growth inducement. there is no reason to do another 'study'.

I176-2

3) This project IF approved should include an extension of the San Luis Rey River Trail across the College Avenue Bridge to the East on the northerly side of the river for eventual connection to the San Luis Rey River Park near Vista Way for connection to future trails there. CALTRANS did not provide the needed path at the extension of the 76 Expressway and have created a dangerous condition from Vista Way to North Santa Fe Avenue.

I176-3

4) The river will flood again, I didn't see that this development would be extending the river dikes eastward. During the last major flooding North River Road was washed away near Melba Bishop Park. This will happen at the North River Farms Project also without a dike or wide flood zone being left in a natural state. If a dike is proposed what impact will it have with Guajome Regional Park on the other side of the River?

I176-4

Sincerely,

Bob Nelson,
Resident & Architect, 1995 General Plan Update Committee on Circulation
1459 Belmont Park Road, Oceanside CA 92057
760-717-9946

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I177 ODEGAARD, MICHAEL

Comment Letter I177

From: Michael Odegaard <modegaard@gmail.com>
Date: September 17, 2018 at 4:47:21 PM PDT
To: <council@ci.oceanside.ca.us>, <zbeck@ci.oceanside.ca.us>
Subject: Opposition to North River Farms project

Dear Mayor and Councilmembers,

I believe the proposed plan has inadequate fuel modification buffering along the sloping north edge of the property adjacent to the open field of the horse ranch, since burning embers from a brushfire will fly right across such an open area. Better to plant irrigated fields around the whole perimeter of this agriculturally themed project both for fire safety and to provide walkable access to farming activities for all residents.

I am also against rezoning the agricultural property to a higher density since traffic on Hwy 76 that would be impacted by the proposed development has already reached an unacceptable level of service.

Sincerely,

Michael Odegaard
959 Vine St Apt 2

I177-1

I177-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I178 GREEN, KAREN

Comment Letter I178

September 17, 2018

Development Services Department
Attn: Rob Dmohowski, Associate Planner
300 N. Coast Highway
Oceanside, CA 92057

Subject: Proposed North River Farms Development – Draft EIR Comments

I have reviewed the subject Draft Environmental Impact Report (DEIR), and urge the City of Oceanside (as Lead Agency) to require the Applicant to substantially revise and recirculate a revised DEIR for public review. The basis for this request is that the DEIR made available for public review in August 2018 contains substantial inaccuracies, critical omissions regarding existing conditions, and prejudicial impact analyses that cannot be remedied by simply addressing received public comments on the subject draft. A revised DEIR is needed to ensure that the public is accurately informed of the project's impacts and their significance and has opportunity to consider the adequacy of proposed mitigation measures based on accurate impact findings. Without recirculation of a revised DEIR, the public and City lack essential information for informed decision-making relative to key issues, as required under Section 15123(b)(3) of the CEQA guidelines, including:

- Whether this environmental document adequately describes the environmental impacts of the proposed project.
- Whether the recommended mitigation measures should be modified and/or adopted.
- Whether there are other mitigation measures or alternatives that should be considered for the proposed project besides those identified in the Draft EIR.

Review comments are organized below by major topics.

The DEIR Fails to Follow CEQA Guidelines for the Environmental Setting (Baseline Physical Conditions) Used to Determine Impact Significance – Impact Analyses are Misleading, and Impact Significance is Understated

- CEQA guidance Title 14 Section 15125(a) states, "(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. *This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*" [italics added]
- Based on the publication of the Notice of Preparation (NOP) for the EIR in November 2017, the baseline condition normally would be based on that timeframe. In the following examples, the DEIR impact analysis provides only token reference to the existing environmental setting without discussion of the project's impacts relative to baseline conditions. Instead the focus of the impact discussion and determination of impact significance is based on a hypothetical future condition, assuming receipt of approval of the applicant's requested General Plan and Zoning amendments. As such, the DEIR impact analysis is misleading and fails to accurately identify the significance of the project's impacts on the local community and City.

I178-1

I178-2

I178-3

APPENDIX T0 (Continued)

- The misleading impact analysis approach is shown, but not limited to, the DEIR impact analysis excerpts provided below.

- Agriculture and Forestry Resources, Section 4.2, Page 4.2-16, under the impact analysis heading: *“Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?The proposed development would conflict with the existing zoning for agricultural use. However, a Zoning Ordinance Amendment is proposed that would designate the entire property as Planned Development – (PD). The Zoning Ordinance Amendment would be proposed concurrently with the proposed project. Therefore, the proposed Zoning Ordinance Amendment, if adopted, would avoid conflicts between proposed development and the existing zoning. If adopted, impacts would be less than significant.”*

1178-4

- In the above example, the impact analysis relative to existing conditions is limited to one sentence identifying that the proposed development would conflict with the existing zoning for agriculture use. There is no identification of the impacts to Agricultural Resources that would be associated with the General Plan and Zoning conflicts nor the significance of those impacts. The rest of the analysis and impact significance conclusion is based on hypothetical approval of the project’s request for General Plan and Zoning amendments.

- Land Use and Planning, Section 4.11, Pages 4.11-7 through 4.11- 10, under the impact analysis heading: *“Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?”*

City of Oceanside General Plan

“The proposed project would introduce new land uses that would conflict with the current City’s General Plan land use designations as described above.With future approval and adoption of the General Plan Amendment by City Council, the proposed project would not conflict with the City’s General Plan with regard to allowable land uses. Therefore, impacts would be less than significant with mitigation incorporated.

Oceanside Zoning Ordinance

“The proposed project introduce[s] new zoning designations that would conflict with the current zoning designations under the Zoning Ordinance; however, the PD Plan proposes a Zoning Ordinance Amendment to avoid conflicts with established designations. Similar to amending the City’s General Plan designation, the Zoning Ordinance Amendment would be proposed concurrently with the proposed project. With the future approval and adoption of the rezone A and A (SP) to PD, the proposed project would not conflict with applicable land use plans or ordinances. Therefore, impacts would be less than significant.”

1178-5

- In the above analysis of the impact analysis is limited to one sentence each pointing out that the project conflicts with the City General Plan and Zoning Ordinance. Similar to the impact analysis for Agricultural Resources, there is no identification of impacts that would be associated with the General Plan and Zoning conflicts nor the significance of those impacts. The rest of the analysis

APPENDIX T0 (Continued)

and impact significance conclusion is based on hypothetical approval of the project's request for General Plan and Zoning amendments.

- Courts have ruled that erroneous use of a "hypothetical allowable condition" as a baseline is misleading and can understate the proposed project's true impacts (Woodward Park Homeowners Association vs City of Fresno 2007). In the case of new projects, comparisons of proposed amendments to an existing General Plan to determine significant impacts (future plan-to-plan comparison) are illusory (Environmental Planning and Information Council (EPIC) v. County of El Dorado County (EIR), 1982), and comparison with "approved" density, rather than existing conditions, conflicts with CEQA (City of Carmel-by-the-Sea v. County of Monterey (ND), 1986).

The DEIR Provides Incomplete Documentation of Received Public Comments

- Two public scoping meetings were held, late 2017 and early 2018. Having personally attended and spoken at both meetings, I am aware the meetings were videotaped to provide a record of received comments. However, only written comments received by the City were included in Appendix A. All received public comments should be considered in the EIR process. Without inclusion of the verbal comments, the DEIR fails to disclose a substantial body of received comments, and it is likely that they were not considered during preparation of the DEIR. It is requested that all public comments received during the scoping process, verbal transcription and written, be included in a revised DEIR.

The DEIR Project Description Is Incomplete and Contains Inaccuracies

- The project site location is fully within the Morro Hills Neighborhood of Oceanside, and that should be accurately stated in the DEIR. The project area is not a "transition area" between urban land uses and Morro Hills. The "transition area" language is misleading, implying that the project area is not within an existing Oceanside neighborhood.
- The DEIR states in Section 3.3.1.2, Page 3-8, that "approximately 31.6 acres would be dedicated to agriculture throughout the project site." That statement appears to be a misrepresentation, both in terms of the stated acreage, as well as lack of assurances that would actually dedicate agricultural uses for the life of the project. Because of the extensive reference to this 31.6 acres of agricultural uses throughout the DEIR as a key project feature, the DEIR project description Section 3.3.1.2 should be revised to include only the acreage that will be actually dedicated for agricultural land use (by zoning designation or legal instrument assurance), and the acreage should only include uses actually associated with agriculture.
 - No assurances are provided that any agricultural uses will actually occur. DEIR Table 3-3, Page 3-22, lists the required Actions and Approvals for the planned development. Dedicated agricultural uses are not listed. Unless there is some legal instrument for assuring that agricultural uses actually will be implemented, the "envisioned" agricultural uses should be considered as hypothetical, and not included as an amenity or offset in the impact analysis sections of the EIR.
 - The North River Farms DEIR, Section 3.3.1.2, Pages 3-8 and 3-9, "proposed agricultural land uses would include the following: Community Garden, Agricultural Trails, Production Agriculture, and Agritourism. Trails should not be included in the total

↑ I178-5
Cont.

I178-6

I178-7

I178-8

I178-9

I178-10

I178-11
↓

APPENDIX T0 (Continued)

- acreage. Agritourism also should not be included, as presently described (“envisioned”) unless there is a set aside of acreage for agriculturally related “tourism.”
- The stated agricultural use acreage also is misrepresented according to planned development areas. The “Agricultural Area” along North River Road – Includes bike lanes (8 to 9 ft width) and natural pave walks (6 to 8 ft), which together total 14 to 17 ft wide, which exceeds the width of the planted areas (9 to 10 ft wide) (see Appendix L2 Part 7, sheet 2 of 9). Thus, non-agricultural uses account for nearly twice the acreage as the actual defined “agricultural” element along North River Road and lower Wilshire Road.
 - The Landscape Plan identifies the landscape treatments along North River Road and lower Wilshire Road: as Orchard Crops and Gateway Crops. The definition of this treatment sounds like landscaping with fruit trees thrown into the mix. The DEIR should separately quantify landscaped areas versus land that will retain the agricultural land use designation and be farmed.
 - Orchard tree Crops and Gateway Crops, which is defined as: “This Landscape may include a combination of organically grown ornamental plants for nursery crops that may include fruit and nut trees, flowering shrubs and other material that has a distinct and well maintained character along North River Road. Final plant design to be done by Agricultural/Farm consultant. Plants may include trees from the orchard list above.” Orchard trees are specified as “oranges, lemons, limes, kumquat, Persimmon, fig, apples, avocado, nectarine, pomegranate, olive.”
 - Section 3.3.1.2, Figure 3-3, lists agricultural areas in the legend that are not described in the DEIR text nor in the project’s landscape plan. Examples include, windrows – typically vegetation used to reduce wind, not clear how they would be agricultural areas. Descriptions for Market garden, farm hub, hotel farm, ecology center, orchard, and orchard intercropping also should be described in Section 3.3.1.2. It is recommended that a table be added to a revised DEIR that adds the acreage associated with each identified agricultural use mentioned in the text or shown on figures, so that the total acreage assigned to agricultural uses is understood by type of use. This is especially important because it is clear that some of the acreage currently included in the total is questionable as an actual type of agricultural use.
 - The production agricultural use area along the southern boundary of the site is not described in the project description, but it should be.
 - The EIR should clarify how each of the proposed agricultural uses would be operated and managed to achieve sustainability over the life of the project.
 - The project phasing described on Pages 3-16 and 3-17 is inadequate. It should address the timing and the assurances that will be secured to ensure all public amenities (open space, parks, agricultural uses) and commercial uses are built prior to completion of residential development for each phase, to ensure that the community actually realizes any benefit from a mixed-use project in Morro Hills.
 - It is noteworthy that the bus transfer station built on North River Road included a commercial element for shops, which was sold to the community as benefit, in

↑ 1178-11
Cont.

1178-12

1178-13

1178-14

1178-15

1178-16

1178-17

↓ 1178-18

APPENDIX T0 (Continued)

association with the residential units bundled with this project. However, the commercial offices are still empty and do not contribute to Oceanside's economy. Furthermore, the Fresh & Easy market at North River/Vandegrift has remained empty for two years.

↑
I178-18
Cont.

Inadequate Zone of Influence Defined for Impact Analysis

- The project's defined Zone of Influence (Figure 4.2-4) is defined to less than 1,500 ft to the north and less than 3,000 feet to the east and west. Given that the proposed project, if approved, will change the land use and zoning from agriculture to residential mixed use, the resulting growth inducing impacts (DEIR Section X, Page Y) will forever change the rural agricultural character of the Morro Hills neighborhood. Therefore, the zone of influence of the project is too narrowly defined and understates the actual influence of the proposed project on the local Morro Hills neighborhood and community at large.

I178-19

Aesthetics Resources, Section 4.1, Inaccurate Environmental Setting and Inappropriate Impact Analysis

- The Aesthetics section does not accurately describe the visual character of the project area in context with its surroundings, does not accurately identify project impacts on aesthetics, and omits the effects of traffic on the aesthetics of an existing rural agricultural neighborhood. These issues are further described below.
- The Aesthetics Section 4.1 of the DEIR erroneously identifies the proposed project as occurring in a "transition area" between urban lands and the South Morro Hills agricultural area to east. The property actually is within the Oceanside's Morro Hills neighborhood (Attachment 1). Attempting to assign the property, which is valuable farmland that historically and currently is under cultivation, as within a "transition area" is misleading with the implication that the property is less aesthetically agricultural or rural.
- The description of the Visual Character of the project site (Page 4.1-7) is biased. The DEIR states that "with the exception of the maintained farm plots, the project site exhibits an overall dilapidated and unkempt appearance contributing to a lack in visual quality." That statement fails to accurately reflect the rural agricultural viewshed for drivers along North River Road, who instead see a panorama of agricultural lands on both sides of North River Road, and riparian habitat adjacent to the farmland along the San Luis Rey River. The agriculture-rural character of the property in context with the viewshed is evidenced in aerial photographs, which clearly show that the majority (more than 90%) of the project area is cultivated farmland and a much smaller percentage of the property (less than 10%) includes old farm buildings (see Attachment 2).

I178-20









I178-21

I178-22

APPENDIX T0 (Continued)

- The Aesthetics impact analysis fails to analyze impacts of the project on the existing baseline conditions. The following excerpt is from Section 4.1 – Pages. 4.1-14, 4.1-15, and 4.1-16, under the heading “*Would the project have a substantial adverse effect on a scenic vista? The project site is currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road. The proposed project includes a Zoning Ordinance Amendment to change the existing zoning to Planned Development (PD). With the future approval and adoption of the rezone from A and A (SP) to PD, the proposed project would not conflict with applicable land use plans or ordinances, as it relates to scenic resources (refer to Section 4.11, Land Use and Planning). Because, the City has not designated any portion of N. River Road as a scenic corridor or as a scenic vista, and because current views are brief and partial obstructed, the proposed project would not adversely affect scenic or panoramic views away from the project site. Impacts would be less than significant.*”
 - *In the above example, the existing baseline conditions is stated in one sentence: “The project site is currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road.” There is no analysis of impact of the project on the agricultural and agricultural-scenic park viewshed.*
 - *The DEIR conclusion that the impact to aesthetics would be less than significant was based on three arguments: (1) a hypothetical consistency with surroundings based on future approval and adoption of rezoning of the area (this is inconsistent with CEQA guidelines, see first comment on Baseline Conditions), (2) the City has not designated any portion of N. River Road as a scenic corridor or scenic vista (fails to compare project to the existing scenic park overlay land use designation), and (3) current views are brief and partially obstructed (fails to accurately describe viewshed and viewer experience of entering a rural area with agricultural land and riparian habitat along San Luis Rey River).*
- The adjacent Arrowood Golf Course (between holes 5 and 6) should be included in the DEIR as a key observation point (KOP) since golfers represent an important local viewer group (see Attachment 2).
- The KOP Figures 4.1-1 through 4.1-5 show the project area on an aerial photograph; however, the visual character of the land is obscured because the project area is shown as colored fill. It is requested that the project area boundary be shown on the figures instead, so that the existing visual character of the land is visible and not covered over by a graphic in these these figures.
 - Aesthetics, Section 4.1 – Pages. 4.1-14, 4.1-15, and 4.1-16, under the impact analysis heading “*Would the project have a substantial adverse effect on a scenic vista? The project site is currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road. The proposed project includes a Zoning Ordinance Amendment to change the existing zoning to Planned Development (PD). With the future approval and adoption of the rezone from A and A (SP) to PD, the proposed project would not conflict with applicable land use plans or ordinances, as it relates to scenic resources (refer to Section 4.11, Land Use and Planning). Because, the City has not designated any portion of N. River Road as a scenic corridor or as a scenic vista, and because current views are brief and partial obstructed, the proposed project would not adversely affect scenic or panoramic views away from the project site. Impacts would be less than significant.*”

APPENDIX T0 (Continued)

<ul style="list-style-type: none"> <li style="margin-left: 40px;"> <ul style="list-style-type: none"> ▪ <i>In the above example, the existing baseline conditions is stated with one sentence: "The project site is currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road." There is no analysis of impact of the project</i> 	 <p style="margin: 0;">I178-27 Cont.</p>
<ul style="list-style-type: none"> • The draft EIR misrepresents aesthetics impacts by failing to address increased traffic from the project within the viewshed. The Traffic analysis indicates more than 2,000 new vehicle trips per day will occur. This will represent a significant change to the current aesthetics of a rural road viewshed. However, the artistic rendering figures do not accurately portray that potential future condition. For example, Figure 4.1-1 does not show any cars, Figure 4.1-2 shows 1 car in the background, and Figure 4.1-3 shows 5 cars depicted in partial or edge views designed to minimize their occurrence in the viewshed. The artistic renderings should be revised to include an accurate portrayal of vehicles on North River Road under the proposed project condition. 	 <p style="margin: 0;">I178-28</p>
<ul style="list-style-type: none"> • The EIR analysis should address the impacts of the proposed urbanization with closely-spaced residential development on the rural character and aesthetics of the Morro Hills neighborhood. 	 <p style="margin: 0;">I178-29</p>
<ul style="list-style-type: none"> • North River Road is a rural scenic road once it enters the Morro Hills neighborhood, providing views of farmland, agricultural operations and open space along the San Luis Rey River. The agricultural-scenic park overlay designation of land along North River Road is not adequately considered in the aesthetics analysis. <ul style="list-style-type: none"> ○ Aesthetics, Section 4.1 – Pages. 4.1-14, 4.1-15, and 4.1-16, under the impact analysis heading <i>"Would the project have a substantial adverse effect on a scenic vista? The project site is currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road. The proposed project includes a Zoning Ordinance Amendment to change the existing zoning to Planned Development (PD). With the future approval and adoption of the rezone from A and A (SP) to PD, the proposed project would not conflict with applicable land use plans or ordinances, as it relates to scenic resources (refer to Section 4.11, Land Use and Planning). Because, the City has not designated any portion of N. River Road as a scenic corridor or as a scenic vista, and because current views are brief and partial obstructed, the proposed project would not adversely affect scenic or panoramic views away from the project site. Impacts would be less than significant."</i> <ul style="list-style-type: none"> ▪ <i>In the above example, the existing baseline conditions is stated with one sentence: "The project site is currently zoned Agricultural (A) with a Scenic Park (SP) overlay on the south side of N. River Road." There is no analysis of impact of the project</i> 	 <p style="margin: 0;">I178-30</p>  <p style="margin: 0;">I178-31</p>
<ul style="list-style-type: none"> • Degradation of aesthetics by night-time lighting associated with the proposed project should be addressed. 	 <p style="margin: 0;">I178-32</p>
<p>Agricultural Land</p> <ul style="list-style-type: none"> • The EIR should address how the project would maintain agricultural compatibility with off-site agricultural land in order to avoid potential conflicts with agricultural uses. The zone of influence for this discussion should include all of the Morro Hills neighborhood, not a narrowly defined zone of influence (see below). 	 <p style="margin: 0;">I178-33</p>
<ul style="list-style-type: none"> • The EIR should clarify how the proposed farmland and community gardens would be operated and managed. 	 <p style="margin: 0;">I178-34</p>

APPENDIX T0 (Continued)

- The EIR should address how the project would maintain agricultural compatibility with off-site agricultural land in order to avoid potential conflicts with agricultural uses.

1178-35

- The North River Farms project, if approved, would induce similar development proposals. The EIR should fully consider the growth inducing potential of approval of the proposed project to the future loss of Oceanside agricultural lands and productivity.

1178-36

Public Safety

- The impact analysis did not consider that North River Road is used as evacuation route for communities of Fallbrook and Bonsall (Attachment 3). Without accurately accounting for traffic impacts of the proposed project in association with existing potential traffic associated with real fire evacuation, the impact analysis is deficient and understates the significance of the proposed project on public safety.

1178-37

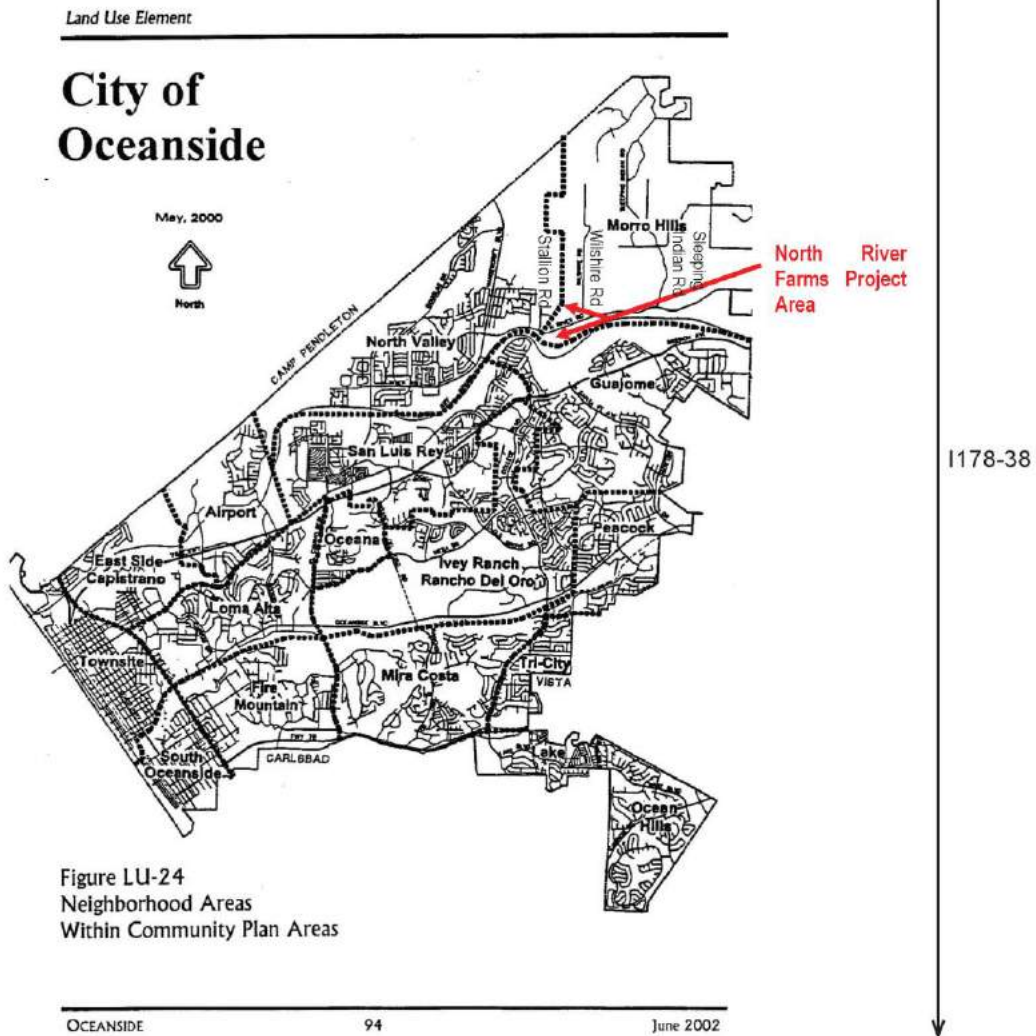
Respectfully Submitted

Karen Green

Resident of Oceanside, Morro Hills Neighborhood

ATTACHMENT 1 - PROJECT AREA WITHIN MORRO HILLS NEIGHBORHOOD

Map from CITY OF OCEANSIDE GENERAL PLAN



APPENDIX T0 (Continued)

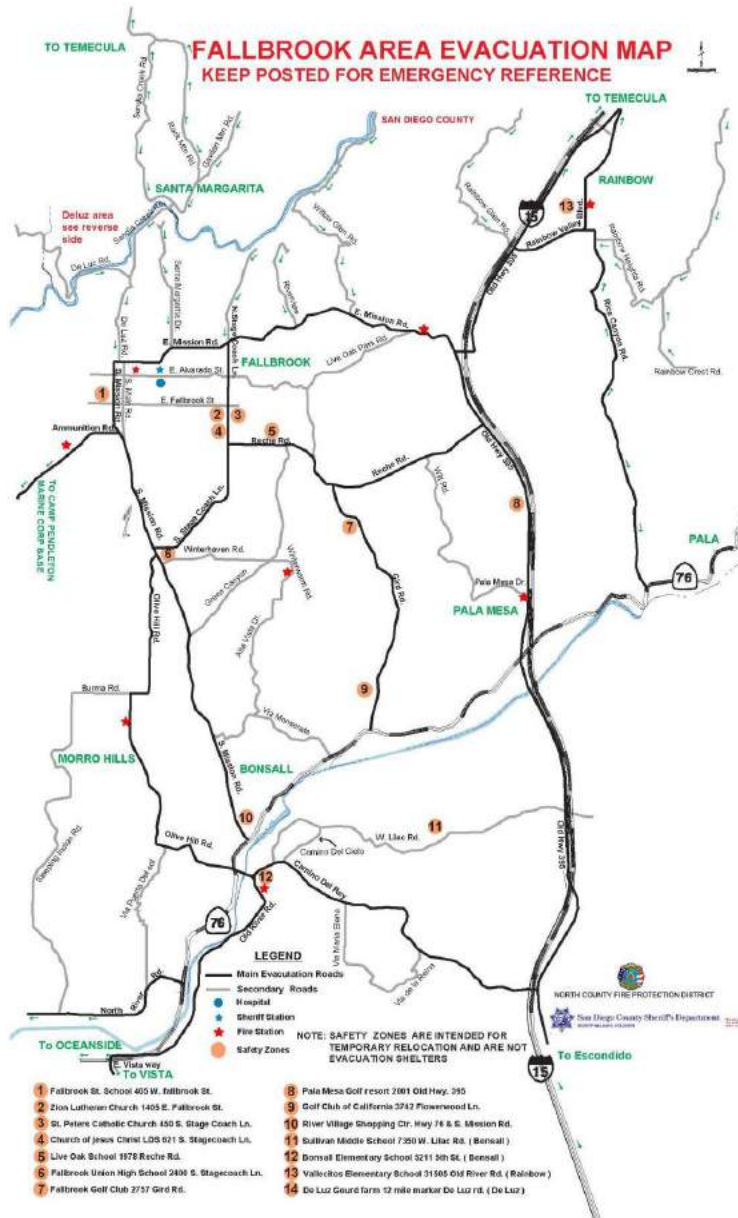
ATTACHMENT 2 – PROPOSED PROJECT AREA (SYMBOL REFERENCE) AGRICULTURAL AESTHETICS COMPARED TO LAND IN MORRO HILLS



↑
1178-38
Cont.
↓

APPENDIX T0 (Continued)

ATTACHMENT 3 – ADJACENT COMMUNITY FIRE EVACUATION MAP



1178-38
Cont.

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I179 BULLOCK, MIKE

Comment Letter I179

Mike Bullock
1800 Bayberry Drive
Oceanside, CA 92054
760-754-8025

September 17, 2018

City of Oceanside
Planning Division
Attn: Robert Dmohowski, Associate Planner
300 North Coast Highway
Oceanside, California 92054

Via E-mail at rdmohowski@ci.oceanside.ca.us

Subject: Comments Regarding *Draft North River Farms Environmental Impact Report*, dated July 2018 ("DEIR")

Dear Mr. Dmohowski,

I appreciate the opportunity to comment on the important subject document, dated July 2018, herein denoted as the "DEIR". I have a BSEE and a MSE (Master's Degree in Engineering) and worked 36 years at Lockheed Martin. For the last 33 years of my time at Lockheed, I worked as a satellite systems engineer. As you may know, anthropogenic climate change is a systems engineering problem, where the overall requirement is for humanity to stabilize the climate at a livable level (or suffer extinction.) This requirement flows down into all human sub-systems, include cars and light-duty trucks in the City of Oceanside.

I179-1

DEIR Fails to Comply with CEQA

The purpose of an environmental impact report is to explain to the decision makers what impacts the project will have on the environment. The ultimate outcome of our anthropogenic climate change crisis can be placed in two categories:

1. we will stabilize our climate at a livable level or
2. the earth's climate will destabilize and transition to a new state in which most of the earth's current life forms no longer exist.

I179-2

Putting the proposed development in the proposed location without significant mitigations could increase vehicle miles travelled (VMT).

Rounding off all the variables to compute an estimated yearly increase in VMT yields the following: 700 Homes x 3 Drivers/Home x 20 miles/(day-driver) x 365 days per year = 15.33 million vehicle miles travelled (VMT) per year. Reference 1 shows that even though we must rapidly convert the fleet of cars and light-duty trucks ("LDVs") on our roads, it is not possible to do this fast enough to avoid the requirement of also

Comments, Draft North River Farms EIR, July 2018

1 of 13

reducing our per-capita VMT (Reference 1), in order to stabilize the climate at a livable level. As you know, LDVs are the largest source of greenhouse gas (GHG).

Therefore, the proposed project will increase GHG. The project either conforms to a plan showing that cars and light-duty trucks can achieve climate-stabilizing targets or it does not. However, the DEIR sheds no light on this fundamental question. As will be shown, the DEIR must do much better, in order to conform to CEQA.

Need to Fully Explain the Gravity of Humanity’s Climate Predicament

The following statements are made in light of the well-established legal principle of “cumulative impacts”, meaning that the outcome of a project must be considered under the assumption that other similar entities, in this case, cities similar to Oceanside, will make decisions that are substantially equivalent to the decisions made in Oceanside. This makes perfect sense and is the answer to the illogical statement that Oceanside can do whatever it wants to do because it is too small to affect the outcome of our anthropogenic climate-change crisis. This principal (cumulative impacts) ensures that our judicial system provides a process that can correctly let decision makers know exactly what is at stake as they consider their decisions. Are they contributing to humanity’s demise or are they part of the solution? Given our anthropogenic climate crisis, hereby often denoted by the single word “climate”, this project will literally either support human survival or contribute significantly to human extinction. The words of the DEIR’s subsection, *Potential Effects of Climate Change, in Section 4.8 – Greenhouse Gas Emissions*, hide the severity and the existential nature of our climate crisis. It is a hideous lie by omission. This lie is repeated in Section 2.6 of the DEIR’s Appendix H.

Again, this DEIR must explain the potential impacts on the environment.

The “environment” is composed of various important features of the physical world, including our own species. Impacts on these features may or may not be reasonably well predicted by how the North River Farms proposal (the project) performs relative to California’s climate mandates, such as AB 32, SB 32, the driving reduction targets of SB 375, and Executive orders S-3-05 and B-30-15. In any case the project’s performance must be evaluated to show compliance or non-compliance with the state’s climate mandates. Certainly, under the principal of cumulative impacts, failure to achieve the above-listed mandates will, it must be assumed, lead to climate destabilization and a resulting catastrophe. Climate destabilization must be clearly explained so that decision-makers understand what is at stake. If the project conforms to California’s climate mandate, this does not mean that it will contribute to climate stabilization, under the principle of cumulative impacts. This is clearly shown in Reference 1. Reference 1 shows that climate stabilization will require that the industrialized world must reduce emission to 80% below 1990 levels by 2030, NOT 2050, as is prescribed by California’s out-of-date and over-taken-by-events climate mandate of S-3-05.

The EIR must show compliance or non-compliance with achieving “climate-stabilizing targets”, where “climate-stabilizing targets” means targets that will, considering cumulative impacts, prevent “climate destabilization”. Briefly, “climate destabilization” is shorthand for having the world go through a so-called climate tipping point. Going

↑
1179-2
Cont.

1179-3
↓

APPENDIX T0 (Continued)

through a tipping point means that the warming feedbacks become dominant and our planet's climate changes into one which will no longer support most of its current life forms, including our own species.

The June, 2008 issue of *Scientific American*¹ wrote of a "devastating collapse of the human population", due to anthropogenic global warming if there is insufficient reductions in our greenhouse gas (GHG) emissions. This is one outcome of "climate destabilization." To avoid this, anthropogenic emissions must first be reduced enough to stop the level of atmospheric CO₂ from continuing to increase. This needs to happen as soon as possible. If it happens too late, we could still suffer a "devastating collapse of the human population", regardless of our actions, after the warming feedbacks become dominant. DEIR must explain both "stabilizing the climate at a livable level" and "climate destabilization."

To comply with CEQA, the EIR must identify the *most* significant impact of all. The extinction of humanity, which would come about if we fail to achieve climate-stabilizing targets, is almost certainly the most significant impact of all. Only identifying such effects as more fires, more heat, and some amount of sea-level rise, while useful, is insufficient and a violation of CEQA law.

Failing to mention human extinction in the DEIR is frustrating, because this failure covers over a primary element of being literate about the climate change: knowing the potential for harm.

Reference 2 has been adopted by the CDP. The EIR needs to ensure that it will provide the information needed to help its readers become climate literate.

The DEIR should help increase climate literacy for public officials.

Humanity must, as Governor Brown said to the Pope, "reverse course or face extinction." Covering up this stark reality violates CEQA law, which calls for a reasonable disclosure of likely harm, for the case of insufficient mitigation.

CARB's updated *Scoping Plan* says that all mitigations should be implemented if they are "technologically feasible and cost effective". Any weaker criterion will violate CEQA law. The DEIR needs to be clear on that point. The EIR needs to apply this criterion to all of the identified mitigation measures, including those in this letter.

Since driving is such a large emitter of GHG, in order to evaluate impacts, assumptions about what California will do regarding LDV (Light Duty Vehicles meaning personal vehicles or, more explicitly, cars and light-duty trucks) fleet efficiency and what California will do regarding adopting an improved method for having Californians pay for the use of our roads, will have to be made, since that will have a significant effect on how much per-capita driving could be accepted. It is reasonable to assume that the state will adopt policies to reduce vehicle-miles travelled (VMT) by cars and light-duty trucks, or "Light-duty vehicles" (LDVs), but only if you make it clear to the state exactly how much help Oceanside will need. Recognizing that predicting LDV's VMT is primarily Oceanside's responsibility,

¹ *Scientific American, The Ethics of Climate Change*, Professor John Broome, June 2008, Page 100

APPENDIX T0 (Continued)

because writing an accurate EIR is Oceanside's responsibility, it becomes obvious that Oceanside must either find and identify or write a plan showing how LDVs can achieve climate-stabilizing targets. On-road transportation causes 47% of the GHG emissions in San Diego; cars and light-duty trucks cause 41%². Oceanside must attempt to partner with the state. The state should take the lead on fleet efficiency and the "road-use charge" ("RUC", as shown in the work to implement SB 1077). Oceanside must take the lead on achieving the needed per-capita driving, assuming the state's RUC, which should help to reduce VMT. Your primary controls on VMT include land use, complete streets, active-transportation facilities, transit systems, car-parking policies, and teaching adults how to safely ride a bicycle in traffic.

The political party that is the majority political party in both California and San Diego County takes the explicit position that many of the above statements are true. For example, the California Democratic Party (CDP) platform (Reference 3) advocates for the following:

... a state plan showing how cars and light-duty trucks can hit climate-stabilizing targets, by defining enforceable measures to achieve the needed fleet efficiency and per-capita driving

Reference 1 is such a state plan. SANDAG, CARB or some other entity could write such a plan, which could then be used as a reference document in your EIR. Oceanside could use Reference 1 or it could use a modified version of Reference 1. One of these alternatives would then be Oceanside's prediction as to how LDVs could achieve climate-stabilizing targets. It has often been said that having no plan to succeed is having a plan to fail. Oceanside staff must not trick the Oceanside Council into choosing failure because there is no plan. Oceanside staff must instead show the Council how to succeed and how to fail and then let the Council decide, with the public fully informed so they can react to the Council choice in the next election.

This is fundamental to CEQA law.

Besides CEQA law, given that our survival hangs in the balance, a plan is mandatory. There also is no other way to comply with CEQA, since decision makers must be shown specifically how the worst environmental outcome could be avoided.

Since not stabilizing the climate is an unacceptably bad outcome, it is imperative that the Plan's EIR show how cars and light-duty trucks could achieve climate-stabilizing targets.

Again, the dominant political party in our state is aware of this fairly-obvious reality. From Reference 3:

Demand Regional Transportation Plan (RTP) driving-reduction targets, shown by science to support climate stabilization

No climate-literate, empathetic person would want anything less.

² *San Diego Greenhouse Inventory*, Energy Policy Initiatives Center, <http://www.sandiego.edu/epic/ghginventory/>

APPENDIX T0 (Continued)

Therefore a Requirements Document, such as Reference 1, is a necessary part of the DEIR.

DEIR's Relationship with "Senate Bill 375"

SB 375 will help meet AB 32. AB 32's explicit target is for year 2020 and to achieve the 1990 emission level in that target year. The importance of that target is less than the targets after 2020, which are as follows:

- 40% below the 1990 level by 2030, from SB 32;
- 80% below the 1990 level by 2050, from Executive Order S-3-05;
- a reasonable climate-stabilizing target, which is 80% below the 1990 level by 2030, as shown in Reference 1

If CARB gives a 2035 target that is not climate-stabilizing, that fact would not relieve Oceanside of its responsibility to figure out how cars and light-duty trucks can achieve a reasonable climate-stabilizing target, for the reasons provided in the above section of this letter.

DEIR and its reference documents need to show exactly how the needed driving reductions could be achieved.

Enforceable and Feasible Mitigation Measures to Achieve Driving Reductions

Reallocate SANDAG Funds Earmarked for Highway Expansion to Transit and Consider Transit-Design Upgrades

It is well-known that the induced traffic demand resulting from adding highway lanes will cause traffic congestion to remain constant. This is true, even if the new lanes are HOV (High Occupancy Vehicle) lanes; HOT (High Occupancy Toll) lanes; or Managed Lanes, which give priority to moving transit vehicles. Any project (or other change, such as autonomous vehicles that can travel at high speeds with very little distance between vehicles) that temporarily creates space on a freeway will induce enough traffic to fill that space, returning congestion to the level it was before the project (or other change.) Therefore, additional lanes will not reduce congestion one iota. The money spent to add lanes is not just a waste of money. With more lanes and the same level of congestion as before, the result is always more frustrated drivers, more air pollution, and more GHG emissions.

The sales tax measure called "Trans-Net" allocates approximately one-third for highway expansion, one-third for transit, and one-third for road maintenance. It has a provision that allows for a reallocation of funds, if supported by at least two-thirds of SANDAG Board members, including a so-called weighted vote, where governments are given a portion of 100 votes, proportional to their population. This feasible mitigation measure is to reallocate the Trans-Net amount, earmarked for all highway expansions, to transit. It is noted that perceived political risk for decision makers does not constitute infeasibility, for a suggested mitigation measure. SANDAG needs to help educate the public about the futility of adding lanes because of induced traffic

↑ I179-3
Cont.

I179-4

I179-5

APPENDIX T0 (Continued)

demand, as well as our responsibility to have a plan showing how cars and light-duty trucks can achieve climate-stabilizing targets. This will reduce political risk.

This money could be used to fund additional transit systems; improve transit operations; and/or redesign and implement the redesign of an existing transit system. A redesign could be the electrification and automation, or even a wholesale technology upgrading of the Coaster/AMTRAK and Sprinter rail lines. These systems need to be frequent and operate 24/7.

The money could also be used to implement a fixed-guideway connection between the San Diego Airport and both the Santa Fe Train Station and the Old Town Transit Center. A trade-off study is needed to find out if this should be done with a trolley extension or an automated system, perhaps using the technology that connects the Oakland Airport to the Coliseum BART station.

Oceanside needs to assume this mitigation measure and then do everything it its power to convince the SANDAG Board that it must be done. AB 805 would help.

1179-5
Cont.

A Comprehensive Road-Use Charge (RUC), Pricing-and-Payout System to Improve the Way We Pay for the Use of Roads

Comprehensive means that, for example, pricing, overall, is sufficient to cover all costs, including road maintenance and externalities such as harm to the environment and health; privacy is defined and achieved; the economic interests of low-income drivers doing necessary driving would be protected; that the incentive to drive fuel-efficient cars would be at least as large as it is under the current fuels-excise tax; and, as good technology becomes available, congestion pricing is used, if needed, to protect critical driving from congestion.

The word "*payout*" means that some of the money collected would go to people that are losing money under the current system.

Currently, user fees (gas taxes and tolls) are not enough to cover road costs. Even though general-fund money is being used to operate and maintain roads, California is not doing maintenance with enough frequency to minimize cost. It is well understood that deferred maintenance will cost more than timely maintenance. Besides this, the improved mileage of the Internal Combustion Engine vehicles (ICEs) and the large number of Zero-Emission Vehicles (ZEVs), both of which are needed to have the fleet efficiency required to achieve climate mandates, mean that gas-tax revenues will drop precipitously over the coming years. In view of these facts, California has passed and is implementing SB 1077, which creates a pilot project road user charge (RUC). The Road User Charge Technical Advisory Committee (RUC TAC) has twice visited San Diego. The first time, they met in the SANDAG Board Room. The second time, they met at the CALTRANS District 4 office. SANDAG Board Members and SANDAG staff were conspicuously absent from these meetings. SANDAG staff did not inform its Board of these meetings. This is unfortunate because a RUC is the future of road funding. Unfortunately, the SANDAG Board Majority seems to think that a new sales tax can be used to expand roads. The recent defeat of Measure A suggests that this is not true.

1179-6

APPENDIX T0 (Continued)

Both SANDAG and Oceanside need to support California in its efforts to create an effective RUC pricing-and- payout system. As the pilot project finishes, legislation is needed to get the design and implementation moving. SANDAG and Oceanside should lobby for a good system and then, in their EIRs, they should assume a good system. Such a system will play a useful role in reducing per-capita driving.

↑
I179-6
Cont.

Improving the Way We Pay for the Use of Car Parking

Bundled-cost parking increases the cost of everything, from rent to food; bundled-benefit parking reduces wages. These unsustainable practices are economically unfair to those that drive less or might like to drive less, if they could receive the fair, market-priced compensation for their effort, considering the high cost of providing parking. Surface parking only provides spaces at a rate of 120 car-spaces per acre of land. Parking garage construction costs are over \$20,000 per space. Underground parking costs from \$60,000 to \$100,000 per space. The fourth bullet of the Transportation Sub-plank of the 2016 California Democratic Party Platform (Reference 2) calls for "*shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking.*"

This feasible mitigation was ignored by the County in their legally-deficient Climate Action Plan (CAP) which they subsequently rescinded under court order. This is the mitigation measure that was described during oral arguments in Appellate Court, when a Justice asked the plaintiff (the Sierra Club) to describe a feasible mitigation measure that was ignored by the County.

After hearing the description, the Justice commented, "Sounds like feasible mitigation to me."

Here is a brief description of this feasible mitigation measure. It is modified to be for Oceanside. This strategy would be a "game-changer", not only for Oceanside, but for improving our prospects for achieving climate-stabilizing targets, wherever driving is a significant source of GHG emissions and so-called "free parking" at work is common.

Demonstration Project to Eliminate the Harm of Bundled-Benefit Parking at Work

Oceanside would develop a Demonstration Project to, in effect, Unbundle the Benefit of Parking ("Demonstration Project") at City Hall ("Proposed Location").

BACKGROUND: Currently, Oceanside employees do not have the ability to choose between earnings and driving – employees effectively pay for parking out of their salary, whether or not they use the parking. The Demonstration Project will provide the opportunity for the employees to choose between earnings and driving. This is functionally equivalent to the implementation of the California Air Pollution Control Officers Association (CAPCOA) measure of unbundling the cost of parking.

I179-7

I179-8

PROJECT: Parking would be charged at a given rate (for example \$0.02/min – roughly \$10.80/day, considering 8 hours of work and 1 hour for lunch). Funds generated from these parking charges would be distributed as earnings to all employees working at the proposed location in proportion to each employee's time spent at work, at the proposed location. Those who decide not to drive will not be charged for parking but will still make earnings based on their time spent at work at the location. Implemented correctly, this free-market approach will substantially reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions, by reducing the drive-alone mode. Note that this location, Oceanside City Hall, is walking distance from a transit center that has above-average bus service and is served by four different rail lines.

For employees whose parking charges are greater than their parking lot earnings, an "add-in" may be included so that no employee loses money, compared to "free parking". (Some documentation of this method refers to this payment as a "must-drive bonus".) With such "add-in" payments, there could be an "Opt in" or "Opt out" choice, meaning that those that "Opt out" will see no changes on their pay check, relative to "free parking".

This project may be helped by receiving a grant to pay the development and installation cost, as well as the "add in" payments, for some specified number of years. Oceanside would need to apply for such a grant.

This feasible mitigation measure is actually a demonstration project of a full system implementation, as described in Reference 4. Reference 5 is a more detailed description of this demonstration project.

Based on Table 1 of Reference 4, the driving reduction could be 25%, at places of employment. Table 1 shows driving reductions resulting from introducing a new price differential for parking, for 10 cases. Its average reduction in driving is 25% and its smallest, single-case reduction is 15%. Again, these systems can be set up so that no driver loses money. Grant possibilities include the California Air Resources Board's *Low Carbon Transportation* program and the Strategic Growth Council's (SGC's) *Transformative Climate Community* program. Reference 6 has more detail on the SGC grant program.

Good Bicycle Projects and Bicycle Traffic Skills Education

The best criterion for spending money for bicycle transportation is the estimated reduction in driving per the amount spent. It is hoped that the following strategies will come close to maximizing this important parameter.

1.) *Projects to Improve Bicycle Access*

All of the smart-growth neighborhoods, central business districts, and other high trip destinations or origins, both existing and planned, should be checked to see if bicycle access could be substantially improved with either a traffic calming project, a "complete streets" project, more shoulder width, or a project to overcome some natural or made-made barrier. One example is to build a Vista Way bicycle bridge over I-5 in Oceanside, to allow those walking or biking to travel between the South Oceanside coastal neighborhood and the regional shopping center, which contains such large stores as

1179-8
Cont.

1179-9

Wal-Mart and the Stator Brothers grocery store. Currently, those walking or biking from the Vista Way area West of I-5 must travel much further and travel over a steep hill (Cassidy Street). There are no large grocery stores in the Coastal region of Oceanside, west of I-5. Vista Way was connected for bike riders and pedestrians before the construction of I-5. Given that the design and construction of the I-5 highway has caused this problem, funding should come from highway funds, for this project.

League of American Bicyclist Certified Instruction of "Traffic Skills 101"

Most serious injuries to bike riders occur in accidents that do not involve a motor vehicle. Most car-bike accidents are caused by wrong-way riding, riding on sidewalks, and errors in intersections; the clear-cut-hit-from-behind accident is rare.

After attending *Traffic Skills 101*, students that pass a rigorous written test and demonstrate proficiency in riding in traffic and other challenging conditions could be paid for their time and effort.

As an example of what could be done in San Diego County, if the average class size was 3 riders per instructor and each rider passes both tests and earns \$100 and if the instructor, with overhead, costs \$500 dollars, for a total of \$800 for each 3 students, that would mean that \$160M could teach $\$160M/\$800 = 200,000$ classes of 3 students, for a total of 600,000 students. This is approximately 20% of the population of San Diego County. If a significant percentage of the graduates become every-day, utilitarian riders, this program will be a very cost-effective mitigation measure. It is certainly technologically feasible.

If SANDAG is uninterested in doing this program countywide, Oceanside could scale the program described above down to a City-run program. Members of Oceanside's Bicycle-Pedestrian Committee already are teaching League-Certified classes, as described above.

1179-9
Cont.

Eliminate or Greatly Increase the Maximum Height and Density Limits Close to Transit Stops that Meet Appropriate Service Standards

As sprawl is reduced, more compact, transit-oriented development (TOD) will need to be built. This strategy will incentivize a consideration of what level of transit service will be needed, how it can be achieved, and what levels of maximum height and density are appropriate. Having no limits at all is reasonable if models show that the development can function without harming the existing adjacent neighborhoods, given the level of transit service and other *supporting transportation policies*. One such *supporting transportation policy* would be the use of car-parking systems described in References 4 and 5, which support the full sharing of parking, less driving, and less car ownership. These are reasons that Oceanside Council and Staff need to weigh in on the redesign and rezoning of the downtown Transit Center.

Section 4.8.3. Thresholds of Significance Misleads

Regarding the 2 items listed the top of the section:

1179-10

APPENDIX T0 (Continued)

1. Generate GHG, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan . . .

It should be made clear that only one of these is needed for the project's impact to be significant. Since there is no overall plan showing how LDVs could achieve climate-stabilizing targets the EIR's attempts to show the reader that the project's GHG emissions would be insignificant are, in the final analysis, bogus. The second paragraph after these two items is an attempt to fool the reader. In fact the words, "that provides specific requirements that will avoid or substantially lessen the cumulative problem" could not be possible be met. Currently, mankind is on a path to destabilize the climate. No expert would dispute this unfortunate fact. To change this, we need to create and implement plans to achieve stabilization. We are not currently doing that. Any additional emission is significant.

Include Plots and Explanations of the Plots, in the EIR, to Leave No Doubt About the Validity and Grave Nature of Anthropogenic Climate Change

Figure 1 shows the rise of the world's atmospheric CO₂ over the last 50 years. Figure 2 shows both atmospheric temperature (averaged over a year and averaged over all of the earth, derived from an isotope analysis) and atmospheric CO₂, over 800,000 years. (Our species is only around 300,000 years old.) Figure 2 shows that when climate deniers say that climate is always changing and so therefore climate change is normal, they are correct, except for one important consideration. There is nothing normal about the outrageous run up of atmospheric CO₂, to over 400 PPM, in such a short time that it appears to be an instantaneous spike, on Figure 2. There is no doubt that the spike is the result of our combustion of fossil fuels. The spike is clearly anthropogenic climate change. Figure 3 covers all of the time of the development of our civilization. By focusing on just 1000 years, the spike's shape is revealed. Everything was normal until about 150 years ago, which is the start of our industrial revolution, when we started to burn fossil fuels. The ominous increase in temperature (in red) is also shown. By doing extensive calculations we know how much CO₂ we have produced from the combustion of fossil fuels. Then, by directly measuring the atmospheric CO₂ and the acidity of the oceans, we know where all of that CO₂ currently resides. We also know that atmospheric CO₂ traps heat. There is no doubt that we have an Anthropogenic Global Warming (AGW) catastrophe in the making. Achieving climate-stabilizing targets is our only hope.

All of this information, or equivalent, must appear in the EIR. This must be "in scope" and needs to be clearly stated in the NOP.

Figure 1 Atmospheric CO₂, Increasing Over Recent Decades

1179-10
Cont.

1179-11

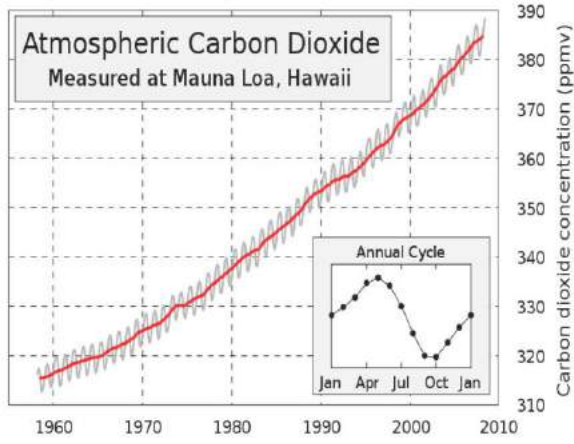
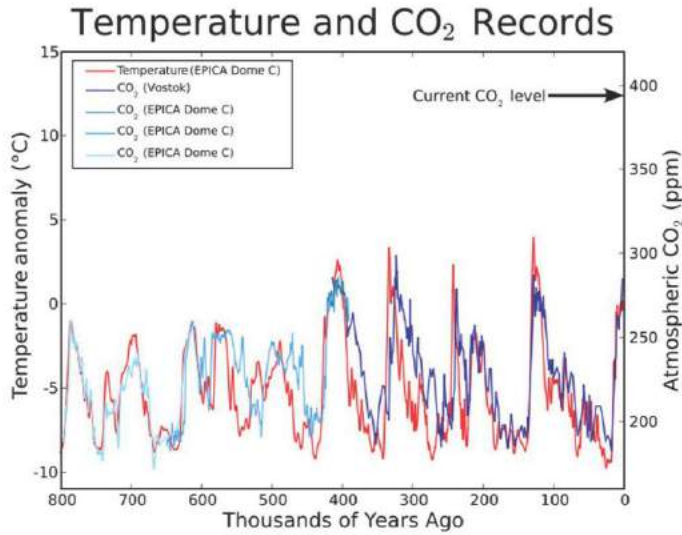
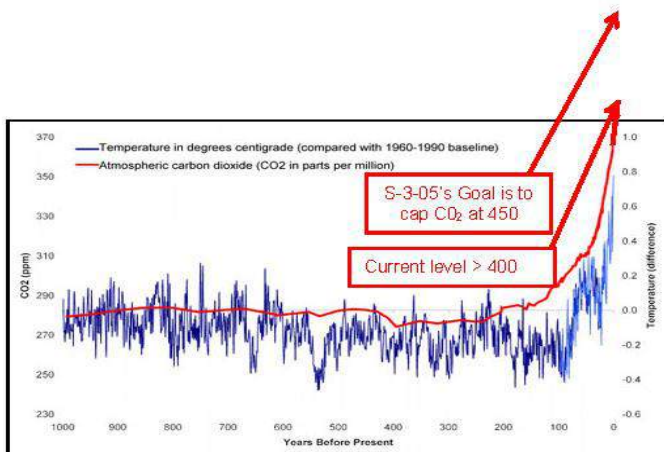


Figure 2 Atmospheric CO₂ and Mean Temperature, from 800,000 Years Ago, with Current CO₂ PPM Shown



1179-11
Cont.

Figure 3 Atmospheric CO2 and Mean Temperature, Over the Last 1,000 Years



1179-11
Cont.

Require the Project and Similar Developments to Provide an Automated-Electric-Bus Transit Service to the Nearest Good, Fixed-Guideway Transit Station

For this project, the transit station would be the College Station of the Sprinter, which is 4.7 miles away. This service would be provided as soon as automated electric buses become available and their cost drops down to 2 million dollars each. Buying 6 of these vehicles would cost \$12M, which would be about \$12M/700 = \$17,000 assessment per home. This would be done as soon as the buses described are commercially available. The system would be operated by the NCTD. Note that there would be no need for drivers and electric buses are much cheaper to maintain than any sort of internal combustion engine bus.

1179-12

In Closing

Thank you for your leadership in performing your critical work. Thank you for reading this material. Please let me know if you would like to meet to discuss this letter or related topics.

Highest regards,

APPENDIX T0 (Continued)

Mike Bullock
760-754-8025

California Democratic Party Delegate, 76 AD
Elected Member of the San Diego County Democratic Party Central Committee
Satellite Systems Engineer, 36 years (Now Retired)
Air and Waste Management Association published and presented papers:
Author, *The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving*
Author, *A Climate-Killing Regional Transportation Plan Winds Up in Court: Background and Remedies*
Co-author, *A Plan to Efficiently and Conveniently Unbundle Car Parking Cost*

References

- 1.) Bullock, Mike R; *Climate-Stabilizing, California Light-Duty Vehicle Requirements, Versus Air Resource Board Goals*, Paper 881-AWMA, from the Air and Waste Management Association's 109th Annual Conference and Exhibition; New Orleans, June 16-25, 2016; Available on request from mike_bullock@earthlink.net and attached to the email submission of this letter
- 2.) California Democratic Party Adopted Resolution, *The Need for Climate Change Literacy*, 2017
- 3.) 2016 California Democratic Party Platform, viewable at <http://www.cadem.org/our-california/platform/2016-platform-energy-and-environment>, excerpted file attached to email submission of letter
- 4.) M. Bullock & J. Stewart, *A Plan to Efficiently and Conveniently Unbundle Car Parking Costs*; Paper 2010-A-554-AWMA, from the Air and Waste Management Association's 103rd Annual Conference and Exhibition; Calgary, Canada, June 21-24, 2010; available upon request from Mike Bullock, mike_bullock@earthlink.net, attached to the email submission of this letter
- 5.) Bullock, Michael; *Equitable and Environmentally-Sound Car-Parking Policy at a Work Site*; Aug. 30, 2015; Available on request from mike_bullock@earthlink.net and attached to the email submission of letter
- 6.) *Transformative Climate Communities, Draft Scoping Guidelines*, California Strategic Growth Council, November 23, 2016, attached to the email submission of this letter

1179-13

Climate-Stabilizing, California Light-Duty Vehicle Requirements, Versus Air Resource Board Goals

Paper 881

Mike R. Bullock

Retired Satellite Systems Engineer, 1800 Bayberry Drive, Oceanside, CA 92054

ABSTRACT

An Introduction is provided, including the importance of light-duty vehicles (LDVs: cars and light duty trucks) and a definition of the top-level LDV requirements to limit their carbon dioxide (“CO₂”) emissions.

Anthropogenic climate change fundamentals are presented, including its cause, its potential for harm, California mandates, and a greenhouse gas (GHG) reduction road map to avoid disaster.

A 2030 climate-stabilizing GHG reduction target value is calculated, using statements by climate experts. The formula for GHG emissions, as a function of per-capita driving, population, fleet CO₂ emissions per mile, and the applicable low-carbon fuel standard (LCFS) is given. The ratio of the 2015 value of car-emission-per-mile to the 2005 value of car-emission-per-mile is obtained.

Internal Combustion Engine (ICE) mileage values from 2000 to 2030 are identified, as either mandates or new requirements. A table is presented that estimates 2015 LDV fleet mileage.

Zero Emission Vehicle (ZEV) parameters are given. A table is shown that uses 2030 ZEV and ICE (ICE LDVs) requirements, named the “Heroic Measures” case, to compute the LDV fleet-equivalent mileage. That equivalent fleet mileage is used, with population and the required emission reduction, to compute a required per-capita driving reduction, with respect to 2005. Measures to achieve this per-capita driving reduction are described, with reductions allocated to each measure. The energy used per year for the Heroic Measures case is estimated

The “Heroic Measures” set of fractions of ZEV’s purchased, as a function of year, is compared to the California Air Resources Board (CARB) goals.

INTRODUCTION

Within the context of working the anthropogenic-climate-change problem and from a systems engineering perspective, the top-level requirement is to reduce greenhouse gas (GHG) emissions enough to support stabilizing our climate at a livable level. This top-level requirement must flow down to the subsystem of LDVs, especially due to the magnitude of their emissions. (As an example, LDVs emit 41% of the GHG in San Diego County¹.)

More specifically, LDV requirements will be identified that, taken together, will result in GHG emission reductions sufficient to “support climate stabilization”. “Support climate stabilization”

1179-13
Cont.

means that the LDV emission level will be equal to a climate-stabilizing target. Such a target is expressed as an emission level in some target year. The target is based on climate science.

From a systems engineering perspective, at the top level, the needed LDV requirements are

- LDV fleet efficiency, meaning the greenhouse gas (GHG) emissions per mile driven, applicable to the entire fleet, on the road in the year of interest and
- an upper bound on per-capita driving, given the derived fleet efficiency and the predicted population growth.

The fleet efficiency requirement will be developed as a function of lower-level requirements, such as Corporate Average Fuel Efficiency (CAFE) requirements, requirements on how fast Battery Electric Vehicles (BEVs) must be added into the fleet each year, and requirements to get low-efficiency vehicles off the roads. The second top-level requirement, the upper bound on per-capita driving, will spawn transportation-system requirements designed to result in less driving, such as better mass transit. This paper will derive a formulae to compute the required per-capita driving levels, based on fleet efficiency, predicted population growth, and the latest, science-based, climate-stabilizing GHG emission target.

In this work, three categories of LDV emission-reduction strategies will be considered: cleaner cars, cleaner fuels, and less driving.

BACKGROUND: OUR ANTHROPOGENIC CLIMATE CHANGE PROBLEM

Purpose of This Section

Before going to work to solve a systems-engineering problem, it is important to understand the nature of the problem. How complex is the problem? How much is at stake if the problem is not solved? Is it reasonable to take a chance and only solve the problem with a reasonably high probability or is there too much at stake to gamble? This section is an attempt to answer these questions.

Basic Cause

Anthropogenic climate change is driven by these two processes²: First, our combustion of fossil fuels is adding “great quantities” of CO₂ into our atmosphere. Second, that additional atmospheric CO₂ is trapping additional heat.

California’s First Three Climate Mandates

California’s Governor’s Executive Order S-3-05³ is similar to the Kyoto Agreement and is based on the greenhouse gas (GHG) reductions that were recommended by climate scientists for industrialized nations back in 2005. In 2005, many climate scientists believed that the reduction-targets of S-3-05 would be sufficient to support stabilizing Earth’s climate at a livable level, with a reasonably high level of certainty. More specifically, this executive order aims for an average, over-the-year, atmospheric temperature rise of “only” 2 degree Celsius, above the preindustrial temperature. It attempts to do this by limiting our earth’s level of atmospheric CO₂ e to 450 PPM by 2050 and then reducing emissions further, so that atmospheric levels would come down



1179-13
Cont.

to more tolerable levels in subsequent years. The S-3-05 emission targets are 2000 emission levels by 2010, 1990 levels by 2020, and 80% below 1990 levels by 2050.

It was thought that if the world achieved S-3-05, there might be a 50% chance that the maximum temperature rise will be less than 2 degrees Celsius, thus leaving a 50% chance that it would be larger than 2 degrees Celsius. A 2 degree increase would put over a billion people on the planet into a condition described as “water stress” and it would mean a loss of 97% of the earth’s coral reefs.

There would also be a 30% chance that the temperature increase would be greater than 3 degrees Celsius. A temperature change of 3 degree Celsius is described in Reference 3 as being “exponentially worse” than a 2 degree Celsius increase.

The second California climate mandate is AB 32, the *Global Warming Solutions Act of 2006*. It includes provisions for a cap and trade program, to ensure meeting S-3-05’s 2020 target of the 1990 level of emissions. It continues after 2020. AB 32 requires CARB to always implement measures that achieve the maximum *technologically feasible and cost-effective* (words taken from AB 32) greenhouse-gas-emission reductions.

In 2015 Governor Brown signed Executive Order B-30-15. This Executive Order established a mandate to achieve an emission level of 40% below 2020 emissions by 2030, as can be seen by a Google search. If Executive Order S-3-05 is interpreted as a straight line between its 2020 target and its 2050 target, then the B-30-15 target of 2030 is the same as S-3-05’s implied target of 2035, because 2035 is halfway between 2020 and 2050 and 40% down is halfway to 80% down.

California is on track to achieve its S-3-05 second (2020) target. However, the world emission levels have, for most years, been increasing, contrary to the S-3-05 trajectory. In part because the world has been consistently failing to follow S-3-05’s 2010-to-2020 trajectory, if California is still interested in leading the way to stabilizing the climate at a livable level, it must do far better than S-3-05, going forward, as will be shown.

Failing to Achieve these Climate Mandates

What could happen if we fail to achieve S-3-05, AB 32, and B-30-15 or if we achieve them but they turn out to be too little too late and other states and countries follow our example?

It has been written⁴ that, “A recent string of reports from impeccable mainstream institutions-the International Energy Agency, the World Bank, the accounting firm of PricewaterhouseCoopers-have warned that the Earth is on a trajectory to warm by at least 4 Degrees Celsius and that this would be incompatible with continued human survival.”

It has also been written⁵ that, “Lags in the replacement of fossil-fuel use by clean energy use have put the world on a pace for 6 degree Celsius by the end of this century. Such a large temperature rise occurred 250 million years ago and extinguished 90 percent of the life on Earth. The current rise is of the same magnitude but is occurring faster.”

Pictures That Are Worth a Thousand Words

1179-13
Cont.

Figure 1 shows (1) atmospheric CO₂ (in blue) and (2) averaged-over-a-year-then-averaged-over-the surface-of-the-earth world atmospheric temperature (in red). This temperature is with respect to a recent preindustrial value. The data starts 800,000 years ago. It shows that the current value of atmospheric CO₂, which is now over 400 PPM, far exceeds the values of the last 800,000 years. It also shows that we should expect the corresponding temperature to eventually be about 12 or 13 degrees above preindustrial temperatures. This would bring about a human disaster^{3,4,5}.

Figure 2 shows the average yearly temperature with respect to the 1960-to-1990 baseline temperature (in blue). It also shows atmospheric levels of CO₂ (in red). The S-3-05 goal of 450 PPM is literally “off the chart”, in Figure 2. Figure 2 shows that, as expected, temperatures are starting to rise along with the increasing levels of CO₂. The large variations in temperature are primarily due to the random nature of the amount of solar energy being received by the earth.

FURTHER BACKGROUND: CALIFORNIA’S SB 375 AND AN IMPORTANT DATA SET

As shown in the Introduction, LDVs emit significant amounts of CO₂. The question arises: will driving need to be reduced or can cleaner cars and cleaner fuels arrive in time to avoid such behavioral change? Steve Winkelman, of the Center for Clean Air Policy (CCAP), worked on this problem.

SB 375, the Sustainable Communities and Climate Protection Act of 2008

Under SB 375, the California Air Resources Board (CARB) has given each Metropolitan Planning Organization (MPO) in California driving-reduction targets, for the years 2020 and 2035. “Driving” means yearly, per capita, vehicle miles travelled (VMT), by LDVs, with respect to 2005. The CARB-provided values are shown at this Wikipedia link, http://en.wikipedia.org/wiki/SB_375. It is important to note that although this link and many other sources show the targets to be “GHG” and not “VMT”, SB 375 clearly states that the reductions are to be the result of the MPO’s Regional Transportation Plan (RTP), or, more specifically, the Sustainable Communities Strategy (SCS) portion of the RTP. Nothing in the SCS will improve average mileage. That will be done by the state and federal government by their Corporate Average Fleet Efficiency (CAFE) standards. The SCS can only reduce GHG by reducing VMT. The only way an SCS can reduce GHG by 12%, for example, is to reduce VMT by 12%.

Under SB 375, every Regional Transportation Plan (RTP) must include a section called a Sustainable Communities Strategy (SCS). The SCS must include driving reduction predictions corresponding to the CARB targets. Each SCS must include only *feasible* transportation, land use, and transportation-related policy data. If the SCS driving-reduction predictions fail to meet the CARB-provided targets, the MPO must prepare an Alternative Planning Strategy (APS). An APS uses *infeasible* transportation, land use, and transportation-related policy assumptions. The total reductions, resulting from both the SCS and the APS, must at least meet the CARB-provided targets.

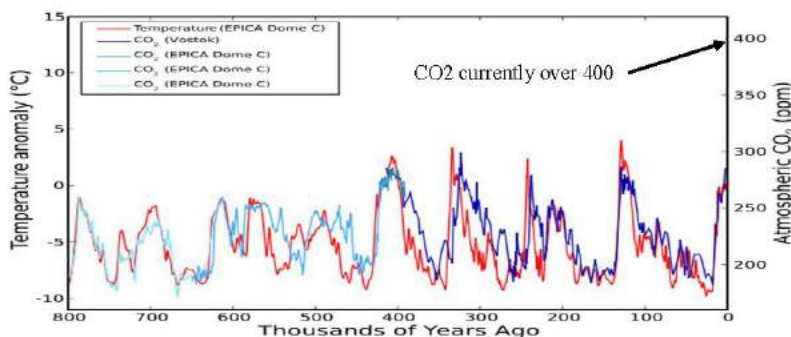
Critical Data: Useful Factors from Steve Winkelman’s Data

1179-13
Cont.

APPENDIX T0 (Continued)

Figure 3⁶ shows 6 variables as a percent of its 2005 value. The year 2005 is the baseline year of SB 375. The red line is the Caltrans prediction of VMT. The purple line is California's current mandate for a Low Carbon Fuel Standard (LCFS). As shown, by 2020, fuel in California must emit 10% less per gallon than in 2005. The turquoise line is the 1990 GHG emission in California. As shown, it is 12% below the 2005 level. This is important because S-3-05 specifies that in 2020, state GHG emission levels must be at the 1990 level. The green line is the CO₂ emitted per mile, as specified by AB 1493, also known as "Pavley 1 and 2" named after Senator Fran Pavley. The values shown do not account for the LCFS. The yellow (or gold) line is the S-3-05 mandate, referenced to 2005 emission levels. The blue line is the product of the red, the purple, and the green line and is the percentage of GHG emissions compared to 2005. Since VMT is not being adequately controlled, the blue line is not achieving the S-3-05 line. Figure 3 shows that driving must be reduced. For this reason, Steve Winkelman can be thought of as the true father of SB 375.

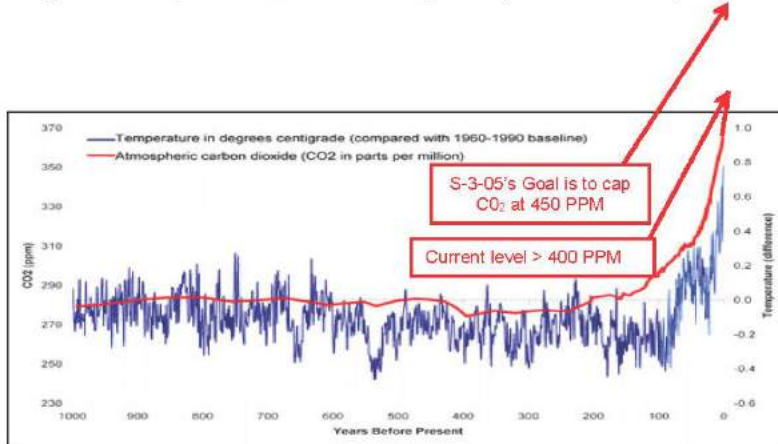
Figure 1. Atmospheric CO₂ and Mean Temperature from 800,000 Years Ago



I179-13
Cont.

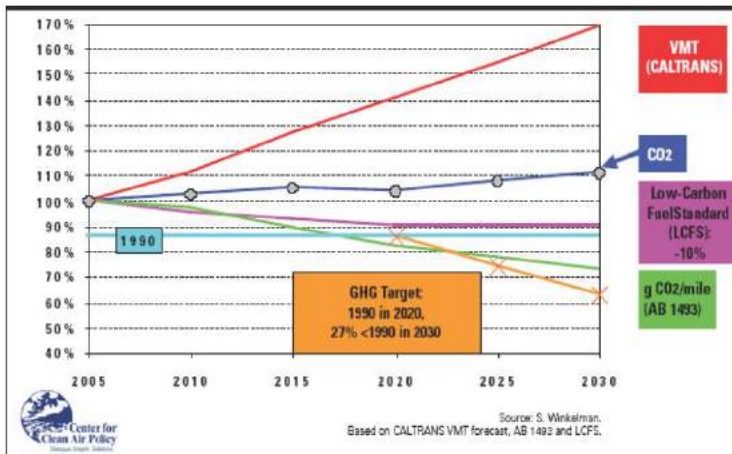
APPENDIX T0 (Continued)

Figure 2. Atmospheric CO₂ and Mean Temperature, Over the Last 1,000 Years



This table provides inspiration for a road map to climate success for LDVs. Climate stabilization targets must be identified and achieved by a set of requirements to define fleet efficiency and per-capita driving.

Figure 3 The S-3-05 Trajectory (the Gold Line) AND the CO₂ Emitted from Personal Driving (the Blue Line), where that CO₂ is a Function (the Product) of the California-Fleet-Average CO₂ per Mile (the Green Line), The Predicted Driving (VMT, the Red Line), and the Low-Carbon Fuel Standard (the Purple Line)



1179-13
Cont.

THE DEVELOPMENT OF CALIFORNIA'S TOP-LEVEL LDV REQUIREMENTS TO SUPPORT CLIMATE STABILIZATION

It is also clear that cleaner cars will be needed and can probably be achieved. As will be seen, much cleaner cars will be needed if driving reductions are going to remain within what many people would consider achievable. Mileage and equivalent mileage will need to be specified. A significant fleet-fraction of Zero-Emission Vehicles (ZEVs, either Battery-Electric LDVs or Hydrogen Fuel Cell LDVs) will be needed. Since mileage and equivalent mileage is more heuristic than emissions per mile, they will be used instead of CO2 per mile driven.

Since the SB-375 work used 2005 as the reference year, it will remain the reference year here.

GHG Target to Support Climate Stabilization

The primary problem with S-3-05 is that California's resolve and actions have been largely ignored by other states, our federal government, and many countries. Therefore, rather than achieving 2000 levels by 2010 and being on a track to achieve 1990 levels by 2020, world emission have been increasing. Reference 7 states on Page 14 that the required rate of reduction, if commenced in 2020, would be 15%. That rate means that the factor of 0.85 must be achieved, year after year. If this were done for 10 years, the factor would be $(0.85)^{10} = 0.2$. We don't know where world emissions will be in 2020. However, it is fairly safe to assume that California will be emitting at its 1990 level in 2020, in accordance with S-3-05. This situation shows that the correct target for California is to achieve emissions that are reduced to 80% below California's 1990 value by 2030. Note that if the reductions start sooner, the rate of reduction of emissions can be less than 15% and the 2030 target could be relaxed somewhat. However, it is doubtful that the world will get the reduction rate anywhere near the needed 15% by 2020. Therefore, the target, of 80% below 1990 levels by 2030 is considered to be correct for California. Reference 7 also calls into question the advisability of aiming for a 2 degree Celsius increase, given the possibilities of positive feedbacks that would increase warming. This concern for positive feedbacks is another reason that this paper will work towards identifying LDV requirement sets that will support achieving 80% below 1990 values by 2030.

Notes on Methods

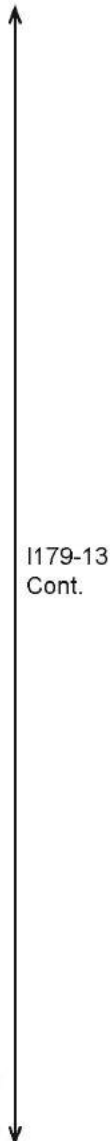
The base year is 2005. An intermediate year of 2015 is used. The car efficiency factor of 2015 with respect to 2005 is taken directly from Figure 3. The car efficiency factor of 2030 with respect to 2015 is derived herein, resulting in a set of car-efficiency requirements. It is assumed that cars last 15 years.

Primary Variable Used

Table 1 defines the primary variables that are used.

Table 1 Variable Definitions

Variable Definitions



APPENDIX T0 (Continued)

e_k	LDV Emitted CO2, in Year “k”
L_k	Low Carbon Fuel Standard (LCFS) Factor that reduces the Per-Gallon CO2 emissions, in Year “k”
c_k	LDV CO2 emitted per mile driven, average, in Year “k”, not accounting for the Low Carbon Fuel Standard (LCFS) Factor
c_k	LDV CO2 emitted per mile driven, average, in Year “k”, accounting for the Low Carbon Fuel Standard (LCFS) Factor
p_k	Population, in Year “k”
d_k	Per-capita LDV driving, in Year “k”
D_k	LDV Driving, in Year “k”
M_k	LDV Mileage, miles per gallon, in Year “k”
m_k	LDV Equivalent Mileage, miles per gallon, in Year “k” accounting for Low Carbon Fuel Standard (LCFS) Factor, so this is M_k/L_k
N	Number of pounds of CO2 per gallon of fuel but not accounting for the Low Carbon Fuel Standard (LCFS) Factor

1179-13
Cont.

Fundamental Equations

The emissions are equal to the CO2 per mile multiplied by the per-capita driving multiplied by the population, since per-capita driving multiplied by the population is total driving. This is true for any year.

$$\text{Future Year k: } e_k = c_k * d_k * p_k \quad (\text{Eq. 1})$$

$$\text{Base Year i: } e_i = c_i * d_i * p_i \quad (\text{Eq. 2})$$

Dividing both sides of Equation 1 by equal values results in an equality. The terms on the right side of the equation can be associated as shown here:

$$\frac{e_k}{e_i} = \frac{c_k}{c_i} * \frac{d_k}{d_i} * \frac{p_k}{p_i} \quad (\text{Eq. 3})$$

Since carbon dioxide emitted per gallon is just a constant (about 20 pounds per gallon), the constant cancels out of the ratio of emissions per mile, leaving the following relationship.

$$\text{To work with mileage: } \frac{m_i}{m_k} = \frac{c_k}{c_i} \quad (\text{Eq. 4})$$

Putting Equation 4 into Equation 3 results in the following equation:

$$\frac{e_k}{e_i} = \frac{m_i}{m_k} * \frac{d_k}{d_i} * \frac{p_k}{p_i} \quad (\text{Eq. 5})$$

APPENDIX T0 (Continued)

Showing the base year of 2005, the future year of 2030, introducing the intermediate year of 2015 and the year of 1990 (since emissions in 2030 are with respect to the 1990 value) results in Equation 6.

$$\frac{e_{2030}}{e_{1990}} * \frac{e_{1990}}{e_{2005}} = \frac{c_{2030}}{c_{2015}} * \frac{c_{2015}}{c_{2005}} * \frac{d_{2030}}{d_{2005}} * \frac{p_{2030}}{p_{2005}} \quad (\text{Eq. 6})$$

The ratio on the far left is the climate-stabilizing target, which is the factor of the 2030 emission to the 1990 emission. It is shown to be 0.20 or 80% less. The next ratio is the emission of 1990 compared to 2005. It is the turquoise line of Figure 3, which is 0.87. The first ratio on the right side of the equation is the fleet emission per mile in 2030 compared to the value in 2015. This ratio will be derived in this report and it will result in a set of car efficiency requirements. Moving to the right, the next ratio is the car efficiency in 2015 compared to 2005. It can be obtained by multiplying the purple line 2015 value times the green line 2015 value, which is 0.90 * 0.93. The next term is the independent variable. It is the driving reduction required, compared to the 2005 level of driving. The final term on the far right is the ratio of the population in 2030 to the population in 2005. Reference 8 shows that California's population in 2005 was 35,985,582. Reference 9 shows that California's population in 2030 is predicted to be 44,279,354. Therefore,

$$\frac{p_{2030}}{p_{2005}} = 44279354 \div 35985582 = 1.2305 \quad (\text{Eq. 7})$$

Putting in the known values results in Equation 8:

$$0.20 * 0.87 = \frac{c_{2030}}{c_{2015}} * 0.90 * 0.93 * \frac{d_{2030}}{d_{2005}} * 1.2305 \quad (\text{Eq. 8})$$

Combining the values, solving for the independent variable (the per-capita driving ratio), and changing from emission-per-mile to equivalent-miles-per-gallon results in the following:

$$\frac{d_{2030}}{d_{2005}} = 0.1689 * \frac{m_{2030}}{m_{2015}} \quad (\text{Eq. 9})$$

With the coefficient being so small, it is doubtful that we can get the equivalent mileage in 2030 to be high enough to keep the driving ratio from falling below one. The mileage of the 2005 fleet will be based on the best data we can get and by assuming cars last 15 years. The equivalent mileage in 2030 will need to be as high as possible to keep the driving-reduction factor from going too far below 1, because it is difficult to reduce driving too much. The equivalent mileage will be dependent on the fleet-efficiency requirements in the near future and going out to 2030. Those requirements are among the primary results of this report.

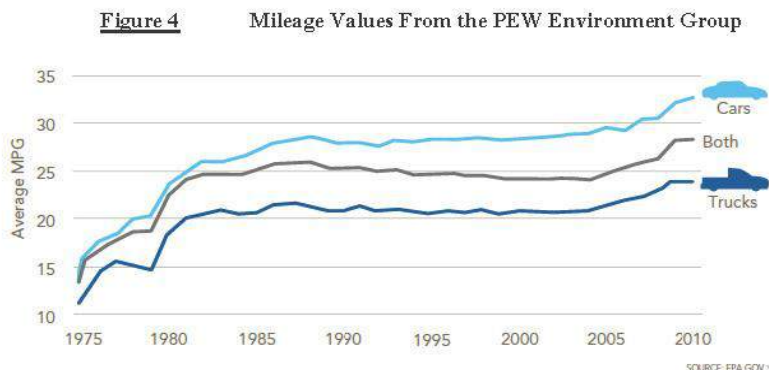
Internal Combustion Engine (ICE) Mileage, from Year 2000 to Year 2030

The years from 2000 to 2011 are taken from a plot produced by the PEW Environment Group,

http://www.pewenvironment.org/uploadedFiles/PEG/Publications/Fact_Sheet/History%20of%20Fuel%20Economy%20Clean%20Energy%20Factsheet.pdf

1179-13
Cont.

The plot is shown here as Figure 4. The “Both” values are used.



The values from 2012 to 2025 are taken from the US Energy Information Agency (EIA) as shown on their website, http://www.eia.doe.gov/federal/executive/vehicle-standards#ldv_2012_to_2025. They are the LDV Corporate Average Fleet Efficiency (CAFE) values enacted into law in the first term of President Obama. From 2025 to 2030, it is assumed that the yearly ICE improvement in CAFE will be 2.5 MPG.

Mileage of California’s LDV Fleet in 2015

Table 2 uses these values of the Internal Combustion Engine (ICE) LDV mileage to compute the mileage of the LDV fleet in 2015. It assumes that the fraction of ZEVs being used over these years is small enough to be ignored. The 100 miles driven, nominally, by each set of cars, is an arbitrary value and inconsequential in the final calculation, because it will divide out. It is never-the-less used, so that it is possible to compare the gallons of fuel used for the different years. The “P” factor could be used to account for a set of cars being driven less. It was decided to not use this option by setting all of the values to 1. The Low Carbon Fuel Standard (LCFS) values are taken from Figure 3. The gallons of fuel are computed as shown in Equation 10, using the definition for L_k that is shown in Table 1.

Table 2 Calculation of the Fleet MPG for 2015

LDV Set	Years Old	Model Year	CAFE MPG	LCFS Factor L_{Year}	Factor Driven f	Gallons Used Per $f*100$ Miles
1	14-15	2001	24.0	1.0	1.0	4.17
2	13-14	2002	24.0	1.0	1.0	4.17

I179-13
Cont.

APPENDIX T0 (Continued)

3	12-13	2003	24.0	1.0	1.0	4.17
4	11-12	2004	24.0	1.0	1.0	4.17
5	10-11	2005	25.0	1.0	1.0	4.00
6	9-10	2006	25.7	.9933	1.0	3.87
7	8-9	2007	26.3	.9867	1.0	3.75
8	7-8	2008	27.0	.9800	1.0	3.63
9	6-7	2009	28.0	.9733	1.0	3.48
10	5-6	2010	28.0	.9667	1.0	3.45
11	4-5	2011	29.1	.9600	1.0	3.30
12	3-4	2012	29.8	.9533	1.0	3.20
13	2-3	2013	30.6	.9467	1.0	3.09
14	1-2	2014	31.4	.9400	1.0	2.99
15	0-1	2015	32.6	.9333	1.0	2.86
Sum of Gallons:						54.29
Miles = 100*Sum(f's):						1500
MPG = Miles/(Sum of Gallons):						27.63

$$\text{Gallons Used per } f * 100 \text{ miles} = \frac{f \times 100}{(\text{CAFE MPG})/L_k} \quad (\text{Eq. 10})$$

↑
1179-13
Cont.
↓

How ICE Mileage Values Will Be Used with ZEV Equivalent Mileage Values

As will be seen, after 2015, the net (computed using both ICEs and ZEVs) mileage values for each year are assumed to greatly improve by having a significant fraction of ZEVs. The ICE CAFÉ standards are used in this report as just the ICE contribution to fleet MPG. The ICE MPG values are inadequate by themselves and will therefore need to become less important because ZEVs will need to quickly take over the highways.

Federal requirements will need to change dramatically. Currently, federally-mandated corporate average fuel efficiency (CAFÉ) standards have been implemented, from 2000 to 2025. These standards require that each corporation produce and sell their fleet of cars and light-duty trucks in the needed proportions, so that the combined mileage of the cars they sell, at least meet the specified mileage.

The car companies want to maximize their profits while achieving the required CAFÉ standard. In California, the car companies will already be required to sell a specified number of electric vehicles, which have a particularly-high, equivalent-value of miles-per-gallon. If the laws are not changed, this will allow these companies to sell more low-mileage, high profit cars and light-duty trucks, and still achieve the federal CAFÉ standard.

It will be better to apply the CAFÉ standards to only the ICEs and then require that the fleet of LDVs sold achieve some mandated fraction of ZEVs. The ZEVs will get better and better equivalent

mileage, as our electrical grid is powered by more renewable sources of energy. Therefore, their equivalent mileage is not fixed, but will improve over the years. Requirements developed here are for 2030. Therefore a high percentage of all the electricity generated in the state, including both the “in front of the meter” (known as the “Renewable Portfolio Standard” or “RPS”) portion and the “behind the meter” portion is assumed to come from sources that do not emit CO2. More specifically, the value of 80% is assumed. This therefore becomes a fleet-efficiency requirement.

ZEV Equivalent Mileage Values

To calculate the mileage of the 2030 fleet of LDVs, it is necessary to derive a formula to compute the equivalent mileage of ZEVs, as a function of the percent of electricity generated without emitting CO2, the equivalent ZEV mileage if the electricity is from 100% fossil fuel, and the equivalent ZEV mileage if the electricity is from 100% non-CO2 sources. The variables defined in Table 3 are used.

The derivation of the equation for equivalent ZEV mileage is based on the notion that the ZEV can be imagined to travel “r” fraction of the time on electricity generated from renewables and “(1-r)” fraction of the time on fossil fuel. If the vehicle travels “D” miles, then, using the definitions shown in Table 3, the following equation can be written.

$$G = \frac{r \times D}{m_{zr}} + \frac{(1-r) \times D}{m_{zf}} \quad \text{(Eq. 11)}$$

$$m_z = D/G = D / \left(\frac{r \times D}{m_{zr}} + \frac{(1-r) \times D}{m_{zf}} \right) \quad \text{(Eq. 12)}$$

Dividing the numerator and the denominator by D and multiplying them both by the product of the two equivalent mileage values results in Equations 13.

$$m_z = m_{zr} \times m_{zf} / (r \times m_{zf} + (1 - r) \times m_{zr}) \quad \text{(Eq. 13)}$$

Again, using the definitions in Table 3 results in the following.

$$m_z = \text{Num} / (\text{Den}) \quad \text{(Eq. 14)}$$

Table 3 Variables Used in the Calculation of ZEV Equivalent Mileage

Variable	Definition
m_z	ZEV Equivalent mileage
m_{zr}	ZEV Equivalent mileage if the electricity is from renewables
m_{zf}	ZEV Equivalent mileage if the electricity is from fossil fuels
r	fraction of electricity generated from sources not emitting CO2
G	Gallons of equivalent fuel used
D	Arbitrary distance travelled
Num	$m_{zr} \times m_{zf}$
Den	$r \times m_{zf} + (1 - r) \times m_{zr}$

↑
1179-13
Cont.
↓

APPENDIX T0 (Continued)

Table 4 shows an assignment of assumed values and the result of a calculation, using Equations 13, 14, and the definitions in Table 3, to produce a ZEV equivalent mileage.

Table 4 Variable Assignment and the Resulting ZEV Mileage

m_{zr}	m_{zf}	r	1-r	Num	Den	m_z
5000	70	0.8	0.2	350000.00	1056.00	331.44

Computing an LDV Fleet Mileage Assuming Heroic Measures (HM)

Table 5 shows the additional definitions that will be used in this calculation. Table 6 computes the 2030 LDV mileage, assuming “Heroic Measures” to reduce the miles driven in poor-mileage ICE’s, in building and selling a significant fraction of ZEVs, and in getting the Low Carbon Fuel Standards to continue to improve beyond the Figure 3 minimum of 0.90.

Table 5 Additional Variables Used in the Calculation of 2030 LDV Mileage

Variable	Definition
D_i	Distance travelled by ICE vehicles
D_z	Distance travelled by ZEVs
G_i	Gallons of Equivalent fuel used by ICE vehicles
G_z	Gallons of Equivalent fuel used by ZEVs

As shown by the values for “f”, government policies must be adopted, in 2030, to reduce the miles driven by the ICE’s, from model years 2016 to 2023. The 2016 model ICE’s are driven only 30% as much as the nominal amount. The 2017 year ICE’s can be driving 10% more. This rate of change continues up to 2023, when the ICE’s are doing less damage, due to the large fraction of ZEVs on the road.

Table 6 Calculation of 2030 LDV Mileage Assuming Heroic Measures

Year	ICE Parameters and Calculations						ZEVs			Yearly Totals		
	CAFÉ MPG	LCFS	Eq. MPG	f	D_i	G_i	z	D_z	G_z	Total Miles	Total Gallons	2030 MPG
2016	34.3	.9267	37.01	.3	30.0	.8105	.04	4	.012	32.8	.7901	41.51
2017	35.1	.9200	38.15	.4	40.0	1.0484	.07	7	.021	44.2	.9962	44.37
2018	36.1	.9133	39.53	.5	47.5	1.2018	.12	12	.036	56.0	1.1494	48.72
2019	37.1	.9000	40.92	.6	54.0	1.3197	.18	18	.054	67.2	1.2567	53.47
2020	38.3	.8500	42.56	.7	52.5	1.2337	.24	24	.072	77.2	1.3225	58.37
2021	40.3	.8000	47.41	.8	48.0	1.0124	.34	34	.103	86.8	1.2162	71.37
2022	42.3	.8000	52.88	.9	40.5	.7660	.48	48	.145	94.8	1.0299	92.05

1179-13
Cont.

APPENDIX T0 (Continued)

2023	44.3	.8000	55.38	1.0	30.0	.5418	.62	62	.187	100.0	.8733	114.51
2024	46.5	.8000	58.13	1.0	15.0	.2581	.76	76	.229	100.0	.6422	155.71
2025	48.7	.8000	60.88	1.0	5.0	.0821	.90	90	.272	100.0	.4358	229.46
2026	51.2	.8000	64.00	1.0	5.0	.0781	.95	95	.287	100.0	.3648	274.16
2027	53.7	.8000	67.13	1.0	5.0	.0745	.98	98	.296	100.0	.3255	307.24
2028	56.2	.8000	70.25	1.0	5.0	.0712	.99	99	.299	100.0	.3129	319.56
2029	58.7	.8000	73.38	1.0	5.0	.0681	.99	99	.299	100.0	.3123	320.18
2030	61.2	.8000	76.50	1.0	5.0	.0654	.99	99	.299	100.0	.3118	320.75
Sum of Miles and then Gallons of Equivalent Fuel:										1259.00	11.34	
Equivalent MPG of LDV Fleet in 2030:										111.03		
Sum of ZEV Miles = 865 . Fraction of Miles Driven by ZEVs = 68.7%												

As shown, the ZEV fraction of the fleet assumes the value of 12%, just 2 years from now (shown in the green field.) It then proceeds upward, to 18% in 2019; 24% in 2020; 34% in 2021; and so on, until it reaches 99% by 2028.

Achieving these fractions of ZEVs might be compared to what was done during World War II, when automobile production lines were rapidly converted to produce tanks. This reduced the new cars that could be purchased. Besides this, rationing gasoline made it difficult to drive at times and, due to shortages of leather, which was being used to produce boots for soldiers, some citizens found it hard to even buy shoes. These rapid and inconvenient changes were tolerated, because most people agreed that the war needed to be won. The heroic measures assumed here may not be possible unless citizens and the political leaders they elect understand the dire consequences of climate destabilization and therefore accept, and even demand, the measures that are needed to support climate stabilization.

The equivalent miles per gallon of the LDV fleet in 2030, specifically 111.03 miles per gallon, will be considered as a potential 2030 LDV requirement.

Computing the Heroic-Measures (HM) Case Per-Capita and Net Driving Factor Requirements, Based on the Result Shown in Table 6

Plugging the

- equivalent MPG of the LDV fleet in Year 2030, taken from the bottom of Table 6, which is 111.03 MPG (m_{2030}), and
- the MPG of the LDV fleet in Year 2015, taken from the bottom of Table 2, which is 27.63 MPG (m_{2015}),

into Equation 9, gives the following result:

$$\frac{d_{2030}}{d_{2005}} = 0.1687 * \frac{m_{2030}}{m_{2015}} = 0.1687 * \frac{111.03}{27.63} = 0.68 \quad (\text{Eq. 14})$$

APPENDIX T0 (Continued)

This means that the per-capita driving in 2030 will need to be about 32% less than in year 2005. The net driving can be computed by multiplying the per-capita driving, 0.68, by the population factor of 1.2305, computed in Equation 7, resulting in 0.84 (since $0.68 \times 1.2305 = 0.84$.) This means that, even with the 23% increase in California's population, the net driving will have to drop by 16%. If this LDV requirement set is selected, all of California's transportation money can be used to improve transit, improve active transportation (mainly walking and biking), and maintain, but not expand, roads. The good news is that there can be little or no congestion because highway capacity now is larger than it was in 2005. Policies will be needed to achieve the required reduction in driving.

Case 2: Computing LDV Requirements that Support Climate Stabilization but Still Allow 2005 Per-Capita Driving

The first step is to use Equation 9 and the value of the mileage in 2015 to compute the needed LDV equivalent fleet mileage for 2030 if the left side of the equation is equal to 1.0.

$$m_{2030} = 1.0 \times m_{2015} / 0.1689 = 27.63 / 0.1689 = 163.59 \text{ MPG} \quad \text{Eq. 15}$$

Table 7 is constructed, with the fraction of ZEVs selected to achieve the needed equivalent fleet mileage of about 163.59 MPG. Since its ZEV fractions are larger and sooner than in the "Heroic Measures" table, Table 7 is showing what has been called the "Extra-Heroic Measures" (EHM) case. The ICE "f" values are unchanged; as are the LCFS values. The EHM ZEV differences from the HM case are the highlighted "z" values.

This means that with the 23% increase in California's population, computed in Equation 7, the net driving would also increase by 23%. If this LDV requirement set were to be implemented, a lot of California's transportation money would be needed to expand the highway system, leaving less to improve transit, improve active transportation (mainly walking and biking), and maintain roads.

1179-13
Cont.

Table 7 Calculation of 2030 LDV Mileage Assuming Extra-Heroic Measures

Year	ICE Parameters and Calculations						ZEVs			Yearly Totals		
	CAFÉ MPG	LCFS	Eq. MPG	f	D_i	G_i	z	D_z	G_z	Total Miles	Total Gallons	2030 MPG
2016	34.3	.9267	37.01	.3	30.0	.8105	.04	0	.012	32.8	.7901	41.51
2017	35.1	.9200	38.15	.4	36.0	.9436	.10	10	.030	46.0	.9738	47.24
2018	36.1	.9133	39.53	.5	35.0	.8855	.25	25	.075	62.5	1.024	61.02
2019	37.1	.9000	40.92	.6	30.0	.7332	.40	40	.121	76.0	1.000	75.96
2020	38.3	.8500	42.56	.7	21.0	.4935	.65	65	.196	89.5	.7718	115.96
2021	40.3	.8000	47.41	.8	8.0	.1687	.90	90	.272	98.0	.4403	222.59

APPENDIX T0 (Continued)

2022	42.3	.8000	52.88	.9	4.5	.0851	.95	.95	.287	99.5	.3717	267.66
2023	44.3	.8000	55.38	1.0	5.0	.0903	.95	.95	.287	100.0	.3769	265.31
2024	46.5	.8000	58.13	1.0	5.0	.0860	.98	.98	.296	100.0	.3301	302.95
2025	48.7	.8000	60.88	1.0	5.0	.0821	.98	.98	.296	100.0	.3285	304.38
2026	51.2	.8000	64.00	1.0	5.0	.0781	.99	.99	.299	100.0	.3143	318.14
2027	53.7	.8000	67.13	1.0	5.0	.0745	.99	.99	.299	100.0	.3136	318.88
2028	56.2	.8000	70.25	1.0	5.0	.0712	.99	.99	.299	100.0	.3129	319.56
2029	58.7	.8000	73.38	1.0	5.0	.0681	.99	.99	.299	100.0	.3123	320.18
2030	61.2	.8000	76.50	1.0	5.0	.0654	.99	.99	.299	100.0	.3118	320.75
Sum of Miles and then Gallons of Equivalent Fuel:										1304.30	7.97	
Equivalent MPG of LDV Fleet in 2030:										163.59		

Comparing the ZEV Fraction Values of the “Heroic-Measures” (HM) Case to the “Extra-Heroic Measures” (EHM) Case

Table 8 shows the direct comparison of the ZEV fractions that are ZEV requirements for the HM Case and the EHM Case. The largest differences are highlighted. The EHM case does not appear to be achievable.

Table 8 HM Case and the EHM Case Which Supports 2005 Per-Capita Driving

Cases	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
HM	.04	.07	.12	.18	.24	.34	.48	.62	.76	.90	.95	.98	.99	.99	.99
EHM	.04	.10	.25	.40	.65	.90	.95	.95	.98	.98	.99	.99	.99	.99	.99

ACHIEVING THE REQUIRED DRIVING REDUCTION OF THE HEROIC-MEASURES (HM) CASE

As shown in Equation 14, in 2030, the per-capita driving will need to at least 32% below the 2005 value. As shown in this link, http://en.wikipedia.org/wiki/SB_375, California’s Metropolitan Planning Organizations (MPOs) are adopting Region Transportation Plans (RTPs) that will achieve reductions in year 2020 and 2035. As also shown there, the targets, for year 2035, range from 0% for Shasta to 16% for Sacramento Area Council of Governments. Since this is for 2030 instead of 2035, and to be reasonably conservative, it is assumed here that the state will achieve a 10% reduction in per-capita driving, in 2030, compared to 2005. This leaves 22% to be achieved by new programs.

The title of each of the following subsections contains the estimated per-capita driving reduction each strategy will achieve, by 2030.

I179-13
Cont.

Reallocate Funds Earmarked for Highway Expansion to Transit and Consider Transit-Design Upgrades (3%)

San Diego County has a sales tax measure called “TransNet”, which allocates one-third for highway expansion, one-third for transit, and one-third for road maintenance. It has a provision that allows for a reallocation of funds, if supported by at least two-thirds of SANDAG Board members, including a so-called weighted vote, where governments are given a portion of 100 votes, proportional to their population. It is hereby proposed to reallocate the TransNet amount, earmarked for highway expansion, to transit and to do similar reallocations throughout California.

This money could be used to fund additional transit systems; improve transit operations; and/or the redesign and implementation of the redesign of existing transit systems. The redesign could include electrification and automation or even upgrading to a different technology.

A Comprehensive Road-Use Fee Pricing and Payout System to Unbundle the Cost of Operating Roads (7.5%)

Comprehensive means that pricing would be set to cover all costs (including road maintenance and externalities such as harm to the environment and health); that privacy and the interests of low-income drivers doing necessary driving would be protected; that the incentive to drive fuel-efficient cars would be at least as large as it is under the current fuels excise tax; and, as good technology becomes available, that congestion pricing is used to protect critical driving from congestion.

The words *payout* and *unbundle* mean that some of the money collected would go to people that are losing money under the current system.

User fees (gas taxes and tolls) are not enough to cover road costs¹⁰ and California is not properly maintaining its roads. Reference 10 shows that in California user fees amount to only 24.1% of what is spent on roads. Besides this, the improved mileage of the ICEs and the large number of ZEVs needed mean that gas tax revenues will drop precipitously.

This system could be used to help reduce the ICE LDV miles driven in 2016 to 2022, as shown in the “F” column of Tables 6 and 7. This system could probably be implemented in less than 5 years.

Unbundling the Cost of Car Parking (7.5%)

Unbundling the cost of car parking¹¹ throughout California is conservatively estimated to decrease driving by 7.5%, based on Table 1 of Reference 11. That table shows driving reductions resulting from introducing a price for parking, for 10 cases. Its average reduction in driving is 25% and its smallest reduction is 15%.

Good Bicycle Projects and Bicycle Traffic Skills Education (3%)

The best criterion for spending money for bicycle transportation is the estimated reduction in driving per the amount spent. The following strategies may come close to maximizing this parameter.

↑
1179-13
Cont.
↓

Projects to Improve Bicycle Access

All of the smart-growth neighborhoods, central business districts, and other high trip destinations or origins, both existing and planned, should be checked to see if bicycle access could be substantially improved with either a traffic calming project, a “complete streets” project, more shoulder width, or a project to overcome some natural or made-made obstacle.

League of American Bicyclist Certified Instruction of “Traffic Skills 101”

Most serious injuries to bike riders occur in accidents that do not involve a motor vehicle¹². Most car-bike accidents are caused by wrong-way riding and errors in intersections; the clear-cut-hit-from-behind accident is rare¹².

After attending *Traffic Skills 101*, students that pass a rigorous written test and demonstrate proficiency in riding in traffic and other challenging conditions could be paid for their time and effort.

As an example of what could be done in San Diego County, if the average class size was 3 riders per instructor and each rider passes both tests and earns \$100 and if the instructor, with overhead, costs \$500 dollars, for a total of \$800 for each 3 students, that would mean that \$160M could teach $\$160M/\$800 = 200,000$ classes of 3 students, for a total of 600,000 students. The population of San Diego County is around 3 million.

Eliminate or Greatly Increase the Maximum Height and Density Limits Close to Transit Stops that Meet Appropriate Service Standards (2%)

As sprawl is reduced, more compact, transit-oriented development (TOD) will need to be built. This strategy will incentivize a consideration of what level of transit service will be needed, how it can be achieved, and what levels of maximum height and density are appropriate. Having no limits at all is reasonable if models show that the development can function without harming the existing adjacent neighborhoods, given the level of transit service and other supporting transportation policies (such as car parking that unbundles the cost and supports the full sharing of parking¹¹) that can be assumed.

Net Driving Reduction from All Identified Strategies

By 2030, the sum of these strategies should be realized. They total 23%, resulting in a 1% margin over the needed 22% (which is added to the existing 10% to get the needed 32%.)

ADDITIONAL ELECTRICITY REQUIRED

The URL http://www.energy.ca.gov/2013_energy_policy/documents/2013-06-26_workshop/presentations/09_VMT-Bob_RAS_21Jun2013.pdf shows that Californians drove about 325 Billion miles per year, from 2002 to 2011. This value can be multiplied by the 0.84 factor reduction of driving, computed right after the calculation shown in Equation 14, and the fraction of miles driven by ZEVs, shown at the bottom of Table 6, of 0.687 (from 68.7%), to give the 2030 miles driven by ZEVs = $325 \text{ Billion} \times 0.84 \times 0.687 = 188 \text{ Billion miles per year}$.



I179-13
Cont.

Using the Tesla information here http://en.wikipedia.org/wiki/Tesla_Roadster, it is assumed that 21.7 kW-h is used per 100 miles, or 0.217 kW-h per mile. The total energy used per year is therefore 188 Billion miles x 0.217 kW-h = 40,699 GW-h.

<http://www.cpuc.ca.gov/cfaqs/howhighiscaliforniaselectricitydemandandwheredoesthepowercomefrom.htm>, shows that California is using about 265,000 GW-h per year. Therefore the electricity needed to power California's HM ZEV LDF fleet in 2030 is 100% x 40,648/265,000 = 15.34% of the amount of electricity California is currently using. Table 4 shows that 80% (r = 0.80, with "r" defined in Table 3) of electricity must generated without producing CO2. This estimated 15.34% increase in demand should help the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) with their planning.

COMPARISON WITH CALIFORNIA AIR RESOURCES BOARD (CARB) PLANNING

The following quote¹³ allows us to compare the CARB plan for LDVs with what would be required to stabilize the climate at a livable level, in the form of the Heroic Measures case:

Regulations on the books in California, set in 2012, require that 2.7 percent of new cars sold in the state this year be, in the regulatory jargon, ZEVs. These are defined as battery-only or fuel-cell cars, and plug-in hybrids. The quota rises every year starting in 2018 and reaches 22 percent in 2025. Nichols wants 100 percent of the new vehicles sold to be zero- or almost-zero-emissions by 2030

Table 9 shows the values implied by this statement and compares them to the HM values. Table 10, which is similar to Tables 6 and 7, computes the overall mileage of the 2030 fleet, using the CARB values.

Computing the Heroic-Measures (HM) Case Per-Capita and Net Driving Factor Requirements, Based on the Result Shown in Table 10

Plugging the

- equivalent MPG of the LDV fleet in Year 2030, taken from the bottom of Table 10, which is 74.25 MPG, and
- the MPG of the LDV fleet in Year 2015, taken from the bottom of Table 2, which is 27.63 MPG,

into Equation 8, gives the following result:

$$\frac{d_{2030}}{d_{2005}} = 0.1687 * \frac{m_{2030}}{m_{2015}} = 0.1687 * \frac{74.25}{27.63} = 0.45 \quad (\text{Eq. 16})$$

Table 9 Zero Emission Vehicle (ZEV) % of Fleet, for Two Cases

Year	CARB	Heroic Measures	Year	CARB	Heroic Measures

1179-13
Cont.

APPENDIX T0 (Continued)

2016	2.7%	4.0%	2024	19.6%	76.0%
2017	2.7%	7.0%	2025	22.0%	90.0%
2018	5.1%	12.0%	2026	37.6%	95.0%
2019	7.5%	18.0%	2027	53.2%	98.0%
2020	9.9%	24.0%	2028	68.8%	99.0%
2021	12.4%	34.0%	2029	84.4%	99.0%
2022	14.8%	48.0%	2030	100.0%	99.0%
2023	17.2%	62.0%			

This means that the per-capita driving will need to be about 55% less in 2030 than in year 2005. The net driving can be computed by multiplying the per-capita driving, 0.45, by the population factor of 1.2305, computed in Equation 7, resulting in 0.55. This means that, even with the 23% increase in California's population, the net driving will have to drop by 45%. If CARB wants the LDV sector to achieve a reasonable climate-stabilizing target, it will need to require ZEV adoption profile closer to the Heroic Measures Case. The adoption profile they have now will require a reduction in driving that will probably be very difficult to achieve.

CONCLUSION

A requirement set named "Heroic Measures" (HM) is quantified. Table 8 shows that the HMLDV efficiency requirements are much easier to achieve than those needed to allow per-capita driving to remain close to its 2005 level, which has been quantified as the "Extra Heroic Measures Case". Strategies to achieve the required HM driving reductions are also allocated and described. They are perhaps about as difficult as achieving the HMLDV fleet efficiency. It is computed that the 2030 fleet of LDV HM ZEVs would require an amount of electricity which is equal to about 15% of what California is using today. The current CARB plan for ZEV adoption is shown to require a very large reduction in driving if LDVs are to achieve a climate-stabilizing target.

Table 10 Calculation of 2030 LDV Mileage Assuming the CARB Values

ICE Parameters and Calculations	ZEVs	<u>Yearly Totals</u>
---------------------------------	------	----------------------

APPENDIX T0 (Continued)

Year	CAFÉ MPG	LCFS	Eq. MPG	f	D_i	G_i	z	D_z	G_z	Total Miles	Total Gallon s	2030 MPG
2016	34.3	.9267	37.01	.3	30.0	.8105	.03	3	.008	31.9	.79681	40.02
2017	35.1	.9200	38.15	.4	40.0	1.0484	.03	3	.008	41.6	1.0283	40.48
2018	36.1	.9133	39.53	.5	47.5	1.2018	.05	5	.015	52.6	1.2158	43.23
2019	37.1	.9000	40.92	.6	54.0	1.3197	.08	8	.023	63.0	1.3787	45.70
2020	38.3	.8500	42.56	.7	52.5	1.2337	.10	10	.030	73.0	1.5114	48.29
2021	40.3	.8000	47.41	.8	48.0	1.0124	.12	12	.037	82.5	1.5162	54.39
2022	42.3	.8000	52.88	.9	40.5	.7660	.15	15	.045	91.5	1.4954	61.17
2023	44.3	.8000	55.38	1.0	30.0	.5418	.17	17	.052	100.0	1.5475	64.62
2024	46.5	.8000	58.13	1.0	15.0	.2581	.20	20	.059	100.0	1.4425	69.32
2025	48.7	.8000	60.88	1.0	5.0	.0821	.22	22	.066	100.0	1.3477	74.20
2026	51.2	.8000	64.00	1.0	5.0	.0781	.38	38	.113	100.0	1.0884	91.87
2027	53.7	.8000	67.13	1.0	5.0	.0745	.53	53	.161	100.0	.8577	116.59
2028	56.2	.8000	70.25	1.0	5.0	.0712	.69	69	.208	100.0	.6517	153.44
2029	58.7	.8000	73.38	1.0	5.0	.0681	.84	84	.255	100.0	.4673	214.02
2030	61.2	.8000	76.50	1.0	5.0	.0654	1.0	100	.302	100.0	.3017	331.44
Sum of Miles and then Gallons of Equivalent Fuel:										1236.00	16.65	
Equivalent MPG of LDV Fleet in 2030:										74.25		

↑
1179-13
Cont.
↓

ABBREVIATIONS AND ACRONYMS

AB 1493 California's Assembly Bill 1493 HM "Heroic Measures" LDV Case

APPENDIX T0 (Continued)

AB 32	California's Assembly Bill 32	ICE	Internal Combustion Engine LDV
APS	Alternative Planning Strategy	kW-h	Kilo Watt-hour
CAFE	Corporate Average Fuel Efficiency	LCFS	Low Carbon Fuel Standard
CARB	California Air Resources Board	LDV	Light-Duty Vehicle
CBD	Center for Biological Diversity	MPO	Metropolitan Planning Organization
CEC	California Energy Commission	Pavley	Senator Pavley's AB 1493
CEQA	California Environmental Quality Act	PPM	Parts per Million
CPUC	California Public Utilities Commission	RPS	Renewable Portfolio Standard
CCAP	Center for Clean Air Policy	RTP	Regional Transportation Plan
CNFF	Cleveland National Forest Foundation	S-3-05	Governor's Executive Order S-3-05
SB 375	California's Senate Bill 375	SANDAG	San Diego Association of Governments
CO₂	Carbon Dioxide	SCS	Sustainable Community Strategy
CO₂_e	Carbon Dioxide Equivalent GHG	TransNet	San Diego County sales tax
EHM	"Extra Heroic Measures" LDV Case	URL	Universal Resource Locator
GEO	Governor's Executive Order	VMT	Vehicle Miles Travelled
GHG	Greenhouse gas	ZEV	Zero Emission Vehicle LDV
GW-h	Giga Watt-Hours		

ACKNOWLEDGEMENTS

Darell Clarke, Lead Volunteer for the Sierra Club's "Beyond Oil Campaign"; Dr. Dennis Martinek, Oceanside Planning Commissioner; Sandra Goldberg, formerly California Deputy Attorney General; Dr. Nilmini Silva-Send, Senior Policy Analyst of the Energy Policy Initiative Center; Diane Nygaard, Director of Preserve Calavera and founder of *Nelson Nygaard Consulting Associates*; Jack Shu, CNFF President; Joan Bullock; San Diego Sierra Club Executive Committee Chairs: Caroline Chase, John Stump, and (former Assembly Member) Lori Saldaña; Malinda Dickenson, *Law Offices of Malinda R. Dickenson*, Conservation Committee Chair Mollie Biggers; Ed Mainland and Jim Stewart, Co-Chairs, Energy-Climate Committee, Sierra Club California; Bern Grush, Chief Scientist, *Skymeter Corporation*; and SANDAG Staff: Susan Baldwin, Senior Regional Planner; Charles Stoll, Director of Land Use and Transportation Planning; and Stephan Vance, Senior Regional Planner.

REFERENCES

- 1 Anders, S. J.; De Haan, D. O.; Silva-Send, N.; Tanaka, S.T.; Tyner, L.; *San Diego County Greenhouse Gas Inventory*, September 2008, <http://www.sandiego.edu/epic/ghginventory/>
- 2 Tarbuck, E.; Lutgens, F.; *Earth Science*, Tenth Edition, published by Prentice Hall, 2003, page 539
- 3 Vespa, M.; *Comments on Survey of CEQA Documents on Greenhouse Gas Emissions Draft Work Plan and Development of GHG Threshold of Significance for Residential and Commercial Projects*, Letter from Center for Biological Diversity to Elaine Chang, Deputy Executive Officer of Planning, Rule Development, and Area Sources of the South Coast Air Quality Management District; dated April 15, 2009. <http://www.aqmd.gov/ceqa/handbook/GHG/2009/april22mtg/CBDcomments.pdf>
- 4 Hertsgaard, M; *Latino Climate Solution, the Nation*, Dec. 24/31, 2012.
- 5 Whitney E.; *How to Meet the Climate Crisis, UU World*, Volume XXVI No. 4, Winter 2012.

1179-13
Cont.

APPENDIX T0 (Continued)

- 6 Adams, T.; Eaken, A.; Notthoff, A.; *Communities Tackle Global Warming, A Guide to California's SB 375*, June 2009, NRDC; <http://www.nrdc.org/globalWarming/sb375/files/sb375.pdf>
- 7 Hansen, James, Brief of Amicus Curiae, Exhibit A, Case3:11-cv-02203-EMC Document108 Filed 11/14/11. from <http://ourchildrenstrust.org/sites/default/files/Hansen%20Amicus%20.pdf>
- 8 State of California, Department of Finance, California County Population Estimates and Components of Change by Year, July 1, 2000-2010. Sacramento, California, December 2011, from <http://www.dof.ca.gov/research/demographic/reports/estimates/e-2/2000-10/>, the "E-2. California County Population Estimates and Components of Change by Year — July 1, 2000-2010"
- 9 Schwarm, Walter, Demographic Research Unit, California Department of Finance, *Total Population Projections for California and Counties: July 1, 2015 to 2060 in 5-year Increments*, from <http://www.dof.ca.gov/research/demographic/reports/projections/P-1/>, then "Report P-1 (County): State and County Total Population Projections, 2010-2060 (5-year increments)" link, to open or download the EXCEL spreadsheet file.
- 10 Henchman, Joseph; *Gasoline Taxes and Tolls Pay for Only a Third of State & Local Road Spending*; January 17, 2013; <http://taxfoundation.org/article/gasoline-taxes-and-tolls-pay-only-third-state-local-road-spending>
- 11 Bullock, M.; Stewart, J.; *A Plan to Efficiently and Conveniently Unbundle Car Parking Costs*; Paper 2010-A-554-AWMA, from the Air and Waste Management Association's 103rd Annual Conference and Exhibition; Calgary, Canada, June 21-24, 2010. <http://sierraclub.typepad.com/files/mike-bullock-parking-paper.pdf>
- 12 Forester, J. *Effective Cycling*, MIT Press, 6th Edition, 1993.
- 13 Lippert, John; *Bloomberg News August 2, 2015; California Has a Plan to End the Auto Industry as We Know It*; <http://www.bloomberg.com/news/articles/2015-08-03/california-regulator-mary-nichols-may-transform-the-auto-industry>

KEYWORDS

Driving, climate, mandates, S-3-05, SB 375, RTP, CEQA, Unbundled, GHG, CAFÉ, ZEVs

↑
1179-13
Cont.
↓

APPENDIX T0 (Continued)

https://www.cadem.org/our-party/standing-committees/body/CDP-Final-Resos-for-Floor_Aug-EBoard-17-08-29.pdf

RESOLUTION 17-05.88

The Need for Climate Change Literacy

WHEREAS, our greenhouse gas (GHG) emissions must be significantly reduced and if, how, how much, and by when, this is done is a science-based, political question, requiring that both the general public and our elected officials be informed and motivated; and

WHEREAS, (1) in late 2013, California adopted the “Next Generation Science Standards” (NGSS); (2) at the October 2015 Conference of the North American Association for Environmental Education (NAAEE), the California Environmental Literacy Task Force (CELTF) presented the environmental elements of the NGSS, revealing that the standards do not guarantee the needed climate literacy; and (3) in May of 2015, the California State PTA adopted “Climate Change Is a Children’s Issue”, a resolution asking school districts to take important actions, including “to educate students on climate and energy literacy and human sustainability”; and (4) elected officials are responsible for policies to reduce GHG emissions; and

WHEREAS, students deserve all of the scientific facts that will clearly and significantly impact their future and, to do their job, elected officials need a sufficient understanding of this unfolding crisis;

THEREFORE BE IT RESOLVED, that the California Democratic Party reinforces the need for all high school students to know, before they graduate, and elected officials to know, acknowledge, and address, as soon as possible, (1) both the existence of and the reason for anthropogenic climate change; (2) its potential for harm; (3) the difference between stabilizing the climate at a livable level and destabilization; (4) science-based, climate-stabilizing, GHG reduction targets; (5) the primary variables and considerations in identifying those targets and (6) the approximate amount of life style and technology change required to achieve those climate-stabilizing targets.

BE IT FURTHER RESOLVED, that this support be communicated to Governor Edmund G. Brown, Senate Pro-Tem Kevin de Leon, Speaker Anthony Rendon, the League of California Cities, the California State Association of Counties, the Superintendent of Public Schools Tom Torlakson, the State Board of Education, the State legislature, and the California School Board Association, in the hope that this issue will come to the attention of all of our elected officials, including school board members.

Author: Mike Bullock, AD76. **Sponsored by:** San Diego County Democratic Party Central Committee; Democratic Club of Carlsbad and Oceanside, Lowell Young, AD5; Michael Allen, AD7; Lynne Wasley, AD10; Igor Tregub, AD15; Rob Means, AD25; Mike Levin, AD55; Nick Anas, AD55; Chris Barroso, AD76; Kyle Krahel-Frolander, AD76; Chuck Lowery, AD76

1179-13
Cont.

From : <http://www.cadem.org/our-california/platform/2016-platform-energy-and-environment>

From the 2016 California Democratic Party (CDP) Platform

Transportation

- Support vehicle regulations to provide healthier air for all Californians, support strong and workable low-emission and zero-emission vehicle standards that will continue to be a model for the country, support Clean Vehicle Incentive programs to include the installation of charging infrastructure, and provide assistance to small businesses to meet the low-emission standards;
- Demand Regional Transportation Plan (RTP) driving-reduction targets, shown by science to support climate stabilization;
- Work for equitable and environmentally-sound road and parking operations; Support strategies to reduce driving, such as smart growth, “complete streets”; teaching bicycling traffic skills; and improving transit, from local systems to high speed rail
- Work for shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking; and,
- Demand a state plan showing how cars and light-duty trucks can hit climate-stabilizing targets, by defining enforceable measures to achieve the needed fleet efficiency and per-capita driving;
- Support policies, including tax policies and the use of Greenhouse Gas Reduction Fund (GGRF) grants, that empower business owners, especially small business owners, to make investments in transportation infrastructure to ensure that freight moves by lower-emission local, short-line freight railroads, instead of adding to highway congestion and pollution.



1179-13
Cont.

A Plan to Efficiently and Conveniently Unbundle Car Parking Costs

Air and Waste Management Association Paper 2010-A-554-AWMA

Mike R. Bullock

Retired Satellite Systems Engineer (36 years), 1800 Bayberry Drive, Oceanside, CA 92054

Jim R. Stewart, PhD

University of the West, 1409 N. Walnut Grove Avenue, Rosemead, CA 91770

ABSTRACT

The *Introduction* shows documented driving reductions due to the pricing of parking. It notes that although the benefits of priced and shared parking are known, such parking has not been widely implemented, due to various concerns. It states that a solution, called "*Intelligent Parking*," will overcome some of these concerns, because it is easy to use and naturally transparent. It asserts that this description will support a "Request for Proposal" (RFP) process. Eight background information items are provided, including how priced parking would help California achieve greenhouse gas reduction targets. A story demonstrates some of the key features of *Intelligent Parking*. Arguments for less parking, shared parking, and priced parking are made. Barriers to progress are identified. The fair pricing of parking is described. New ways to characterize transportation demand management are presented. Seven goals of *Intelligent Parking* are listed. Eleven definitions and concepts, that together define *Intelligent Parking*, are described. This includes a method to compute a baseline price of parking and how to adjust that price instantaneously to keep the vacancy above 15% ("Congestion Pricing"). An implementation strategy is described.

INTRODUCTION:

It has been well established that appropriately priced parking will significantly reduce driving¹. Most case studies presented in Table I are evaluations of the most general type of "car-parking cash-out": a program that pays employees extra money each time they get to work without driving. They show that a price differential between using parking and not using parking will significantly reduce driving, even when transit is described as poor. Since driving *must* be reduced², the pricing of parking is desirable.

Shared parking is also recognized as desirable because it can sometimes result in less parking being needed.

Although the advantages of pricing and sharing parking have been recognized for many years, these practices are still rare. This paper identifies some of the reasons for this lack of progress. The pricing and sharing method of this paper has a natural transparency and ease of use that would reduce many of the concerns. This paper also suggests that those governments that have the necessary resources can take the lead role in developing and implementing the described systems. These governments will recover their investments, over time.

This paper describes how parking facilities could be tied together and operated in an optimum system, named *Intelligent Parking*. The description of *Intelligent Parking* is sufficient to support a "Request for Proposal" process, leading to full implementation.

There are two distinct parts to *Intelligent Parking*. The first is how to set the price. The second is how to distribute the earnings. Briefly, the earnings go to the individuals in the group for whom the parking is built.

1179-13
Cont.

APPENDIX T0 (Continued)

Table 1 Eleven Cases of Pricing Impact on Parking Demand

Location	Number of Workers @ Number of Firms	1995 \$'s Per Mo.	Parking Use Decrease
<i>Group A: Areas with poor public transportation</i>			
West Los Angeles	3500 @ 100+	\$81	15%
Cornell University, Ithaca, NY	9000 Faculty & Staff	\$34	26%
San Fernando Valley, Los Angeles	850 @ 1	\$37	30%
Costa Mesa, CA	Not Shown	\$37	22%
Average for Group		\$47	23%
<i>Group B: Areas with fair public transportation</i>			
Los Angeles Civic Center	10,000+ @ "Several"	\$125	36%
Mid-Wilshire Blvd, Los Angeles	1 "Mid-Size" Firm	\$89	38%
Washington DC Suburbs	5,500 @ 3	\$68	26%
Downtown Los Angeles	5,000 @ 118	\$126	25%
Average for Group		\$102	31%
<i>Group C: Areas with good public transportation</i>			
U. of Washington, Seattle, WA	50,000 employees, students	\$18	24%
Downtown Ottawa, Canada	3,500 government staff	\$72	18%
Bellevue, WA	430 @ 1	\$54	39%
Average for Group, except Bellevue, WA Case[^]		\$45	21%
Overall Average, Excluding Bellevue, WA Case[^]			25%

[^] Bellevue, WA case was not used in the averages because its walk/bike facilities also improved and those improvements could have caused part of the decrease in driving.

PERTINENT BACKGROUND INFORMATION

- Vehicle miles traveled (VMT) are a major cause of global warming and pollution^{2, 3}.
- California's Metropolitan Planning Organizations (MPOs) will need to adopt strategies that reduce vehicle miles traveled (VMT), in order to meet SB375 GHG reduction targets, to be issued by the California Air Resources Board in late 2010, for years 2020 and 2035².
- The appropriate pricing of parking is one of the least costly documented tools to reduce VMT.
- New technologies, such as sensors feeding computer-generated billing, offer the potential to efficiently bill drivers for parking and alert law enforcement of trespassers.
- Reformed parking policies can increase fairness, so that, for example, people who use transit or walk do not have to pay higher prices or suffer reduced wages, due to parking.

1179-13
Cont.

- Methods to unbundle parking cost are inefficient unless they support the spontaneous sharing of parking spaces. Shared parking with unbundled cost would ultimately allow cities to require significantly less parking.
- Typical systems of timed parking and metered parking are far from ideal. Parking has no automated record keeping, so it is difficult to know where there is too much or too little.
- Good policies will eventually let cities turn parking minimums into parking maximums.

A GLIMPSE INTO A POSSIBLE FUTURE

Jason is driving to work for the first time in several years. He has decided to save money by carrying home a new 3-D, big-screen computer, which he plans to purchase at a store near his office after work. He wanted to avoid paying delivery charges.

Things have been changing around his office development since they unbundled the cost of parking at the near-by train station. Many people who caught the early trains and lived close to the station stopped driving and parking in the best parking spaces; demand for housing close to the station went up; and wealthy riders, who insisted on driving, did so, confident that they could always find parking as close to the platform as their schedules required, due to congestion pricing. Who would have guessed how much those people were willing to pay? It was shocking. Parking-lot earnings, paid to round-trip train riders, meant that the net cost to ride the train went significantly down. Ridership and neighborhood vitality both went significantly up. All Jason knew was that the price to park at his office had been going up yearly because of increased land values. His parking-lot earnings from his office had been increasing almost every month, due to the ripple effect of train riders parking off-site at cheaper parking. Some of them were using his office parking.

As he pulls out of his driveway, he tells his GPS navigation unit his work hours (it already knew his office location), the location of the store where he plans to buy the computer, and his estimated arrival and departure times at the store. He tells the GPS unit he wants to park once, park no more than 1 block from the store, walk no more than 1 mile total, and pay no more than an average of \$2 per hour to park. He is not surprised to hear the GPS tell him that his request is impossible. He tells the GPS he will pay an average of \$3 per hour and learns that the GPS has located parking.

It guides him into a church parking lot. He hopes the church will use his money wisely. The GPS tells him the location of a bus stop he could use to get to work and the bus's next arrival time at the stop. With automatic passenger identification and billing, the bus has become easy to use, except that it is often crowded. Jason gets out of the car and walks to work, with no action required regarding the parking.

Three weeks later, when Jason gets his monthly statement for his charges and income for automotive road use, transit use, parking charges, and parking earnings, he finds that the day's parking did indeed cost about \$30 for the 10 total hours that he parked. He notes that the parking-lot earnings for his office parking averaged about \$10 per day that month. He then notices the parking lot earnings from the store, where he spent about \$1000 dollars. He sees that the parking-lot earnings percent for the store that month was 1.7%, giving him about \$17. So for the day, Jason only spent a net of about \$3 on parking. Then he realized that he should have had the computer delivered after all. If he would have bicycled that day, as he usually did, he would have still gotten the \$27 earnings from the two parking facilities and he would have paid nothing

1179-13
Cont.

for parking. So the choice to drive cost him \$30. He remembers that the delivery would have only been \$25 dollars. Oh well. He enjoyed his before-work and after-work walks.

THE CASE FOR LESS PARKING

Less parking will support more compact development.¹ This makes walking and biking more enjoyable and less time consuming. There would certainly be less “dead space”, which is how parking lots feel to people, whether they arrive by car or not, after they become pedestrians.

Since parking can be expensive, less parking can reduce overhead costs significantly, such as leasing expense and parking-lot maintenance cost. Less overhead means more profit and less expense for everyone. A need for less parking can create redevelopment opportunities at existing developments and reduce project cost at new developments.

At new developments, car-parking costs could prevent a project from getting built.²

THE CASE FOR SHARED PARKING

Shared parking for mixed uses means that less parking is needed. For example, shared parking could be used mostly by employees during the day and mostly by residents at night.

Fully shared parking means that very little parking would be off limits to anyone. In a central business district with shared parking, drivers would be more likely to park one time per visit, even when going to several locations. Pedestrian activity adds vitality to any area.

THE CASE FOR APPROPRIATELY-PRICED PARKING

To Reduce Driving Relative to Zero Pricing

Traditional Charging or Paying Cash-out Payments

As shown in the Introduction, this relationship (pricing parking reduces driving) is not new.³

Using results like Table 1, at least one study⁴ has used an assumption of widespread pricing to show how driving reductions could help meet greenhouse gas (GHG) target reductions. Dr. Silva Send of EPIC <http://www.sandiego.edu/epic/ghgpolicy/> assumes that all work locations with 100 employees or more in San Diego County will implement cash-out, to result in 12% less driving to work. Currently, almost all employees in San Diego County “park for free”, unless they happen to work in a downtown core area.

¹ This is especially true of surface parking, which only accommodates 120 cars per acre.

² On September 23, 2008, a panel of developers reviewed the Oceanside, Ca. “Coast Highway Vision” http://www.ci.oceanside.ca.us/pdf/chv_finalvisionstrategieplan.pdf. Parts of this plan were described as smart growth.

At the review, developer Tom Wiegel said, “Parking is the number 1 reason to do nothing,” where “do nothing” meant “build no project.” The other developers at the meeting agreed.

³ For many years the Victoria Transport Policy Institute (VTPI) has been recognized as a source of reliable information on “Transportation Demand Management”, or TDM.

From http://www.vtpi.org/tadm/tadm72.htm#_Price_Parking:

Even a relatively small parking fee can cause significant travel impacts and provide significant TDM benefits. “TDM Benefits” refers to the many public and private benefits of having fewer people choosing to drive.

1179-13
Cont.

APPENDIX T0 (Continued)

Current, Best-Practice "Unbundling"

The "best-practice" use of the phrase, "unbundled parking cost", is to describe the case where either the cost of parking, for the case of a condominium, or the rent for parking, for the case of an apartment, is separated from either the purchase price and common fees or the rent of the dwelling unit.

This gives the resident families the choice of selecting the number of parking spaces they would like to rent or buy, including the choice of zero. This would tend to reduce the average number of cars owned per dwelling unit and, in this way, would also tend to reduce driving. Its major drawback is that this method does not encourage sharing.

To Increase Fairness and Protect the US Economy

It is stated above that almost all employees in San Diego County "park for free". Of course there is really no such thing as "parking for free". So-called "free parking" always reduces wages or increases costs. At a work site, it reduces everyone's wage, even those employees that never drive. At an apartment complex, so-called "free parking" increases the rent. Therefore, "free parking" at work or at apartments violates the fundamental rule of the free market, which is that people should pay for what they use and not be forced to pay for what they do not use. Parking should at least be priced to achieve fairness to non-drivers.

The US economy would also benefit. Reductions in driving would lead to reductions in oil imports, which would reduce the US trade deficit.⁴

BARRIERS TO PROGRESS

Given all this, it might seem that the widespread pricing of parking should have happened by now. However there are barriers. In 2007, a majority of the City Council of Cupertino, Ca. indicated that they wanted their City Manger to negotiate reduced parking requirements with any company that would agree to pay sufficient cash-out payments. To this date, no company, including Apple Inc., has expressed an interest. Most companies probably perceive cash-out as expensive. Even if they realize they could get a reduced parking requirement in exchange for paying sufficient cash-out amounts and even if the economics worked in support of this action (quite possible where land is expensive), they want to stay focused on their core business, instead of getting involved in new approaches to parking, real estate, and redevelopment.

On the other hand, simply charging for parking and then giving all the employees a pay raise is probably going to run into opposition from the employees, who will feel that they would be losing a useful benefit.

In addition, neighbors fear the intrusion of parked cars on their streets. Permit parking, which could offer protection, is not always embraced. City Council members know that a sizable fraction of voting citizens believe that there can actually never be too much "free parking",

⁴ From http://en.wikipedia.org/wiki/Balance_of_trade#Warren_Buffett_on_trade_deficits, Warren Buffet wrote in 2006,

"The U.S. trade deficit is a bigger threat to the domestic economy than either the federal budget deficit or consumer debt and could lead to political turmoil. Right now, the rest of the world owns \$3 trillion more of us than we own of them."

1179-13
Cont.

APPENDIX T0 (Continued)

Professor Shoup's famous book⁵ notwithstanding. Some Council members probably feel that way themselves.

It doesn't help that current methods of charging for downtown parking are often very inefficient.⁵ For example, downtown Oceanside, California has parking meters that will only accept coins. Besides this, all their on-street, downtown parking is timed, with maximums from 10 minutes to 4 hours. These time limits are enforced by a city employee, who applies chalk from a tire to the street and then records the time. However, by watching the time and moving their car soon enough, drivers can avoid getting a ticket. Of course, they could instead drive to the mall and not have to worry about having coins or elapsed time since parking. It is not surprising that downtown merchants often object to charging for parking.

In summary, those that resist charging for parking, *based on their perceptions, include*

- Companies, *who fear the complexity and expense of paying cash-out payments;*
- Employees, *who fear of losing a current benefit;*
- City leaders, *who fear the political repercussions;*
- Downtown patrons, *who dislike the inconvenience and worry;*
- Downtown business owners, *who fear that it will drive away customers.*

THE COST, VALUE, AND FAIR PRICE OF PARKING

Estimated and Actual Capital Cost

Surface Parking

One acre of surface parking will accommodate 120 cars. Land zoned for mixed use is sometimes expensive. At \$1.2 million per acre, the land for a single parking space costs \$10,000.

Construction cost should be added to this to get the actual, as-built cost of each parking space. Estimated cost can be determined by using appraised land value and construction estimates. For new developments, after the parking is constructed, it is important to note the actual, as-built cost.

Parking-Garage Parking

One acre of parking-garage will accommodate considerably more than 120 cars. The construction cost of the garage and the value of its land can be added together to get the total cost. Dividing that total cost by the number of parking spaces yields the total, as-built cost of each parking space. Adding levels to a parking garage may seem like a way to cut the cost of each parking space, for the case of expensive land. However, there is a limit to the usefulness of this strategy because the taller the parking garage, the more massive the supporting structural members must be on the lower levels, which increases total cost. Parking-garage parking spaces are often said to cost between \$20,000 and \$40,000. The actual costs should be noted.

Underground Parking

In order to compute an estimate for the cost of a parking space that is under a building, it is necessary to get an estimate of the building cost with and without the underground parking. The difference, divided by the number of parking spaces, yields the cost of each parking space. The

⁵ According to Bern Grush, Chief Scientist of Skymeter Corporation <http://www.skymetercorp.com/cms/index.php>, often two-thirds of the money collected from parking meters is used for collection and enforcement costs.

1179-13
Cont.

APPENDIX T0 (Continued)

cost or value of land plays no role in the cost of this parking. However, it does not follow that this parking is cheap. Underground parking spaces are often said to cost between \$60,000 and \$90,000 dollars each. Although there will be an “as built” cost of the building with the parking, there will never be an “as built” cost of the building without the parking. However, after the construction is done, the estimate for the cost of the underground parking should be reconsidered and re-estimated if that is needed. The final, best-estimate cost should be noted.

Value

Initially, value and cost are the same. For surface parking and parking-garage parking, the value would initially be the same as the as-built cost. For underground parking, the value would initially be the same as the best-estimate cost. However, over time, the value must be updated. Both construction costs and land-value costs will change. The value assigned to a parking place should always be based on the current conditions.

Fair Pricing

Parking space “values”, as described above, must first be converted to a yearly price by using a reasonable conversion factor. This conversion factor could be based on either the “cost of money” or the “earnings potential of money”. It is expected that this conversion factor would be 2% to 5% during times of low interest rates and slow growth; but could be over 10% during times of high-interest and high growth. For example, if the surface parking value is \$12,000 and it is agreed upon to use 5% as the conversion factor, then each parking spot should generate \$600 per year, just to cover capital costs. The amount needed for operations, collection, maintenance, depreciation, and any special applicable tax is then added to the amount that covers capital cost. This sum is the amount that needs to be generated in a year, by the parking space.

The yearly amount of money to cover capital cost needs to be re-calculated every year or so, since both the value and the conversion factor will, in general, change each year. The cost of operations, collection, maintenance, depreciation, and any special applicable tax will also need to be reconsidered.

Once the amount generated per year is known, the base price, per unit year, can be computed by dividing it (the amount generated per year) by the estimated fraction of time that the space will be occupied, over a year. For example, if a parking space needs to generate \$900 per year but it will only be occupied 50% of the time, the time rate charge is \$1800 per year. This charge rate per year can then be converted to an hourly or even a per-minute rate. The estimated fraction of time that the parking is occupied over a year will need to be reconsidered at least yearly.

NEW DEFINITIONS TO PROMOTE AN OBJECTIVE VIEW OF PRICING

- The “fair price” means the price that accounts for all costs.
- The “baseline amount of driving” means the driving that results from the application of the fair price.
- “Zero transportation demand management” (“zero TDM”) is the amount of demand management that results when the fair price is used. It will result in the baseline amount of driving.
- “Negative TDM” refers to the case where the price is set below the fair price. This will cause driving to exceed the baseline amount. Since TDM is commonly thought to be an action that reduces driving, it follows that negative TDM would have the opposite effect.
- “Positive TDM” refers to the case where the price is set above the fair price. This would cause the amount of driving to fall below the baseline amount.

1179-13
Cont.

APPENDIX T0 (Continued)

Clearly, so-called “free parking” is an extreme case of negative TDM. The only way to further encourage driving would be to have a system that pays a driver for the time their car is parked.

THE GOALS OF INTELLIGENT PARKING

- There is only one agency operating all parking. (“All parking” does not include driveways and garages in single-family homes.) *Intelligent Parking* is designed and installed by regional or state government, using low-bid contractors, with design and start-up costs covered by the overhead portion of collection fees.
- Nearly all parking is shared. Almost always, anyone can park anywhere. Those who want exclusive rights to parking will pay “24/7” (all day, every day).
- Parking is operated so that the potential users of parking will escape the expense of parking by choosing to not use the parking. This characteristic is named “unbundled” because the cost of parking is effectively unbundled from other costs.
- Parking is priced and marketed to eliminate the need to drive around looking for parking.
- Parking at any desired price is made as easy as possible to find and use.
- Records of the use of each parking space are kept, to facilitate decisions to either add or subtract parking spaces.
- The special needs of disabled drivers, the privacy of all drivers, and, if desired, the economic interests of low-income drivers are protected.

DEFINITIONS & CONCEPTS OF INTELLIGENT PARKING

Parking Beneficiary Groups

There are at least 7 types of beneficiary groups. Note that in all cases, members of beneficiary groups must be old enough to drive.

- 1.) People who have already paid for the capital cost of parking. An example of this type of beneficiary group would be the owners of condominiums, where parking has been built and the cost is included in the price of the condominium. Note that although they have technically already paid for the parking, if they borrowed money to pay for some portion of the price, the cost is built into their monthly payment. This illustrates why the value of parking and the cost of borrowing money (rate of return on money) are key input variables to use to compute the appropriate base, hourly charge for parking.
- 2.) People who are incurring on-going costs of parking. An example of this type of beneficiary group is a set of office workers, where the cost of “their” parking is contained in either the building lease or the cost of the building. Either way, the parking costs are reducing the wages that can be paid to these employees.⁶
- 3.) People who are purchasing or renting something where the cost of the parking is included in the price. Examples of this beneficiary group are people that rent hotel rooms, rent an apartment, buy items, or dine in establishments that have parking.

⁶ Such parking is often said to be “for the benefit of the employees”. Defining this beneficiary group will tend to make this statement true, as opposed to the common situation where the employees benefit only in proportion to their use of the parking.

1179-13
Cont.

- 4.) People who own off-street parking as a business. They could be the individual investors or could be a government or government-formed entity.
- 5.) People who are said to benefit from parking, even though the money for the parking has been supplied by a source that may have very little relationship to those that are said to benefit. An example of this group would be train riders that make round trips from a station which has parking that is said to be “for riders”. Students at a school with parking would be another example.
- 6.) People who are considered by many to be the logical beneficiaries of on-street parking. Owners of single-family homes are the beneficiaries of the parking that is along the boundaries of their property. The same status is given to residents of multi-family housing.
- 7.) Governments. Since they build and maintain the streets, they should get a significant benefit from on-street parking.

Unbundled Cost and Spontaneous Sharing

“Unbundled cost” means those who use the parking can see exactly what it costs and those who don’t use the parking will either avoid its cost entirely or will get earnings to make up for the hidden parking cost they had to pay. This conforms to the usual rule of the free market where a person only pays for what they choose to use. Unbundled cost is fair.

“Spontaneous sharing” means that anyone can park anywhere at any time and for any length of time. Proper pricing makes this feasible.

How to Unbundle

The method of unbundling can be simply stated, using the concept of “beneficiary group” as discussed above. First, the fair price for the parking is charged. The resulting earnings⁷ amount is given to the members of the beneficiary group in a manner that is fair to each member. Methods are described below.

Why this Supports Sharing

Members of a beneficiary group benefit financially when “their” parking is used. They will appreciate users increasing their earnings. They are also not obligated to park in “their” parking. If there is less-expensive parking within a reasonable distance, they might park there, to save money. This is fine, because all parking is included in the *Intelligent Parking* system.

Computing the Earnings for Individuals

Intelligent Parking must be rigorous in paying out earnings⁷. For a mixed use, the total number of parking spaces must first be allocated to the various beneficiary groups. For example in an office/housing complex, 63.5% of the parking might have been sold with the office. If so, the housing portion must be paying for the other 36.5%. For this case, it would follow that the first step is to allocate 63.5% of the earnings to the workers and 36.5% to the residents.

⁷ The earnings amount is the revenue collected minus the collection cost and any other costs that will have to be paid due to the implementation of *Intelligent Parking*. The costs associated with the parking, paid *before* the implementation of *Intelligent Parking*, should *not* be subtracted from the revenue because they will continue to be paid as they were before the implementation of *Intelligent Parking*. Therefore, these costs will continue to reduce wages and increase the prices of goods and services.

1179-13
Cont.

APPENDIX T0 (Continued)

How the monthly earnings are divided up among the members of the beneficiary group depends on the beneficiary group type. For each member, the group's total monthly earnings amount is always multiplied by a quantity and divided by the sum (the sum is the denominator) of that quantity, for all members.

For example, for each employee, the multiplier is the number of hours that the employee worked over the month while the denominator is the total number of hours worked by all employees over the month. At a school, for each student, the numerator is the total time spent at the school, over the month, while the denominator is the sum of the same quantity, for all the students.

For a train station with parking being supplied for passengers that ride on round trips of one day or less, the numerator is the passenger's monthly hours spent on such round trips, over the month; while the denominator is the total number of hours spent by all passengers on such round trips, over the month. Radio Frequency Identification (RFID) units on passengers could support an automated calculation of monthly charges for fares, as well as monthly hours on round trips.

At a shopping center, the numerator is the sum of the money spent by the shopper, over the month, while the denominator is the total amount of money spent by all shoppers over the month.

At a condominium, the numerator is the number of parking places that were paid for (directly or indirectly) by the resident family and the denominator is the total number of parking places at the condominium project; similarly, for apartment complexes.

Where Earnings Are Low

The goal is that if someone doesn't park, they don't pay, either directly or indirectly, because the earnings that they get will balance out their losses (like reduced wages, for example). However, charging for parking that few want to use will not sufficiently compensate the people that have been forced, or are being forced, to pay for such parking. The only remedy in this case is to redevelop the parking or lease the parking in some other way, for storage, for example. The earnings from the new use should go to those that are in the beneficiary group that was associated with the low-performing parking.

Why This Method of Unbundling Will Feel Familiar to Leaders

Developers will still be required to provide parking and will still pass this cost on, as has been discussed. There will be no need to force an owner of an existing office with parking to break his single business into two separate businesses (office and parking).

Parking beneficiaries are identified that conform to traditional ideas about who should benefit from parking.⁸

Unbundling the Cost of On-Street Parking

The revenue from on-street parking in front of businesses will be split evenly between the city and the business's parking beneficiaries. All of the earnings from on-street parking in front of apartments or single-family homes will be given to the resident families.⁹

⁸ Showing exactly where parking earnings go will reduce the political difficulties of adopting pay parking in a democracy where the high cost of parking is often hidden and rarely discussed.

⁹ Although governments own the streets, often, back in history, developers paid for them and this cost became embedded in property values. Admittedly, how to allocate on-street parking earnings is somewhat arbitrary. With

1179-13
Cont.

Special Considerations for Condominiums

Unbundling for a condominium owner means that, although their allocated amount of parking has added to their initial cost, their allocated amount of parking also earns money for them.

Unbundling for a condominium could also mean that an owner can choose to have control over a single or several parking places. Such parking spaces could be equipped with a red light and a green light. If the red light is lit, this will mean that the space is not available for parking, except for the person who is controlling the spot. If the green light is lit, it will mean that the space is available to anyone. A space that is being reserved with a red light is charged at the full price to the condominium owner that has control over the space. The owner that controls these spaces can change the state of the parking space (available or not available) by either a phone call, on line, or at any pay station system that might be in use for the system. After condominium owners experience the cost of reserving a space for themselves, they might give up on the idea of having their own, personal, unshared parking space; especially since *Intelligent Parking* will give most owners and their guests all the flexibility they need in terms of parking their cars.

Some people think that condominium parking should be gated, for security reasons. However, parking within parking garages needs to be patrolled at the same frequency level as on-street parking, which is enough to ensure that crime around either type of parking is very rare. Cameras can help make parking garages that are open to the public safe from criminal activity.

Special Considerations for Renters

Unbundling for renters means that, although their allocated amount of parking increases their rent, their allocated amount of parking also earns money for them. Therefore, their traditional rent (includes parking) is effectively reduced by the money earned by those parking spaces allocated to them. Renters will be motivated to either not own a car or to park in a cheaper location. Parking in a cheaper location is not a problem because all parking is part of the *Intelligent Parking* system. Renters will welcome anyone to park in "their" parking, because it will increase their earnings.

Special Considerations for Employers

At first, companies may want the option of offering "free parking" to their employees so as to be able to compete with traditional job sites. This means giving employees that drive every single day an "add-in" amount of pay so that the sum of the add-in and their parking-lot earnings equals their charge, for any given monthly statement. The operator of the parking, which sends out statements, can pay out the "add in" amount, in accordance with the company's instruction. The company will then be billed for these amounts. There could be no requirement for the company to provide any such "add-in" amount to the employees that don't drive every day. This would allow the company to treat its every-day drivers better than other employees and so this would be a negative TDM. However, this economic discrimination would be substantially less than the current, status-quo, economic discrimination, where drivers get "free" parking and non-drivers get nothing.

Clusters of Parking

Clusters are a contiguous set of parking spaces that are nearly equal in desirability and thus can be assigned the same price. They should probably consist of from 20 to 40 spaces. For off-street

congestion pricing and efficient methods, governments may earn significantly more than they are under current practices.

1179-13
Cont.

parking, they could be on either side of the access lane to the parking spaces, so that an observer could see the 20 to 40 cars, and get a feel for the vacancy rate. At a train station, clusters will normally be organized so that their parking spaces are approximately an equal distance from the boarding area. On-street clusters would normally conform to our current understanding of what a block is, which is to say from one cross street to the next cross street. The width of the street and the length of the block should be taken into account in defining on-street clusters of parking and in deciding if the parking on either side of the street should or should not be in the same cluster of parking spaces.

Examples of Good and Bad Technology

Parking Meters or Pay Stations

Parking meters are a relic of an earlier period, before computers. Pay stations do not add enough usefulness to merit their inclusion in *Intelligent Parking*, except as a bridge technology. Once good systems are set up, pay stations should cost additional money to use because of their expense. It would be best to devise an implementation strategy that will minimize their use when the system is first put into effect and will take them out of service as soon as possible.

Radio Frequency Identification Backed Up by Video-Based “Car Present” and License Recognition

Government will eventually enter into an RFID (Radio Frequency Identification) age. Organizers of large athletic events already have. Organizers that put on large open-water swims, foot races, and bike rides have routinely used RFID for many years.¹⁰ An RFID vendor in San Diego¹¹ states that passive RFID units cost less than \$5, are reliable, are durable, and they could be used to identify cars as well as people. He also sees no problem in implementing most of the features of *Intelligent Parking*.¹²

Automatic Data Collection and Sending Out Statements

Note that the “back end database” of Dr. Carta’s written statement¹² refers to the ability to send statements of earnings and billing to students.¹³

1179-13
Cont.

¹⁰ For example, over 20,000 people ran the 2008 Bay-to-Breakers foot race in San Francisco. Each runner had a “chip” in their shoe lace. Each runner’s start time and finish time were recorded and all results were available as soon as the last runner crossed the finish line.

¹¹David R. Carta, PhD, CEO Telaeris Inc., 858-449-3454

¹² Concerning a Final Environmental Impact Report-approved and funded new high school in Carlsbad, California, where the School Board has signed a *Settlement Agreement* to consider “*unbundled parking*”, “*cash-out*”, and “*pricing*”, Dr. Carta wrote, in a January 13th, 2010 written statement to the Board,

I wanted to send a quick note discussing the technical feasibility of tracking cars into a lot without impacting students or requiring the need for gates. Mike Bullock and I have discussed this project; it can be accomplished straightforwardly by utilizing Radio Frequency Identification and/or Video Cameras integrated with automated license recognition systems. The cars would need to register with the system at the start, but it would be fairly painless for the users after the initial installation. The back end database system can also be implemented both straightforwardly and at a reasonable price.

This is not necessarily a recommendation of the proposal for unbundled parking. Rather it is strictly an unbiased view of the technical feasibility of the proposal to easily and unobtrusively track cars, both registered and unregistered, into a fixed lot.

¹³ In an earlier email on this subject, Dr. Carta wrote,

Putting it Together

Certainly, government, and in particular transit agencies and parking agencies, could use RFID-based technology. For example, when a person with an RFID unit which is tied to a billable address or a credit card with an open account gets on a bus or a train, they should not have to pay at that time, visit a pay station, or “swipe a card” that has a positive balance. Utility customers that pay their bills are not required to pre-pay. The same courtesy should be extended to transit riders, people that drive on roads, people that get parking-lot earnings, and people that park cars. There should be one monthly bill or statement, for all four activities.

Global Positioning Systems GPS

An alternative model is to have GPS systems in cars that would detect the car’s parking location, that location’s current charge rate, and would perform all of the charging functions in the car. The only information the parking-lot-enforcement system would need is whether or not a car being parked is owned by a bill-paying owner. The car owner’s responsibility would be to pay the bills indicated by the box in the car. The box would need to process a signal that a bill had been paid. It would also need to process pricing signals.

Not Picking Winners

The purpose of this report is to describe what an ideal system would do, *not* how it is done. How a proposed system works is left to the systems, software, and hardware engineers that work together to submit a proposal based on this description of what an ideal system does.

Privacy

Privacy means that no one can see where someone has parked, without a search warrant. Also, the level of the detail of information that appears on a bill is selected by the customer.¹⁴

Ease of Use for Drivers

For credit-worthy drivers that have followed the rules of the system, pay parking will not require any actions other than parking. Paying for all parking fees over a month is then done in response to a monthly billing statement. Parking will feel to the consumer like a service provided by a municipality, such as water, energy, or garbage. One important difference is that users belonging to a “beneficiary group” will get an earnings amount in their monthly statement. Those that earn more than what they are charged will receive a check for the difference. This ease of use will make all parking less stressful.

Base Price

Off-Street

This is not too tough - we probably would integrate with a service that already sends physical mail from an electronic submission instead of re-inventing this wheel.

¹⁴ License plates that have no RFID tags fail to use the best technology to accomplish the primary purpose of license plates, which is to identify and help intercept cars used in a crime. Identifying cars is a legitimate government goal. Protecting privacy is also a legitimate goal. Both goals can be realized with good laws, good enforcement, and good systems engineering.

1179-13
Cont.

APPENDIX T0 (Continued)

Off-street parking is priced so that even if demand does not threaten to fill the parking beyond 85%, the money generated will at least equate to an agreed-upon return on the parking value and pay all yearly costs. Equation 1 shows the calculation of the hourly rate.

$$r_{BaselineHourly} = \frac{(r_{Investment} \times v_{Parking}) + c_{YOPD}}{(n_{HoursPerYear} \times f_{TO})} \quad (Eq. 1)$$

where:

$r_{BaselineHourly}$	=	the computed baseline hourly rate to park
$r_{Investment}$	=	yearly return on investment, such as .06
$v_{Parking}$	=	value of a parking space, such as (parking garage) \$40,000
c_{YOPD}	=	yearly operations ¹⁵ plus depreciation, per space, such as \$100
$n_{HoursPerYear}$	=	number of hours per year, 24 x 365 = 8760 Hours per Year
f_{TO}	=	fraction of time occupied, such as 0.55.

For the example values given, the base hourly rate of parking, to cover the cost of the investment, operations¹⁵, and depreciation is \$0.519 per hour. This could be rounded up to \$0.52 per hour. This price could also be increased to result in positive TDM, to reduce driving more than the fair-price, zero-TDM amount.

On-Street

If on-street parking is located within walking distance (one-quarter mile) of off-street parking, its base price is set equal to the closest off-street parking's base price. Otherwise, it is set to some agreed-upon value, like fifty cents per hour. However, on-street parking has a special meaning for downtown merchants and for neighborhoods, two powerful political forces in any city. Merchants that have few cars parking on their street, even though it is permitted, are probably failing in their businesses. They would like free parking to help draw visitors to their store front. Neighborhoods that are not impacted by parking would probably prefer no pricing. For these reasons, for any on-street parking cluster, no price is charged until the cluster occupancy reaches 50%. (Time of day is irrelevant.)

Congestion Pricing

The time-rate price of parking is dynamically set on each cluster of parking, to prevent the occupancy rate from exceeding 85% (to reduce the need to drive around looking for parking). An 85% occupancy rate (15% vacancy) results in just over one vacant parking space per city block⁵. If the vacancy rate is above 30%, the price is left at the baseline hourly rate. If vacancies fall below 30%, the price can be calculated in a stair-step method, such as shown in Table 2.

Equation 2 is an alternative method.

In either case, the total charge is time parked, multiplied by the time-averaged, time-rate price. The base multiplier would be adjusted to be just large enough to keep the vacancy rate from falling below a desired level, such as 15%, so it is always easy to find parking.

¹⁵ This includes money for policing, cleaning, maintenance, any applicable parking tax, and all collection costs. Collection costs will need to include an amount to recover the development and installation costs of *Intelligent Parking*.

1179-13
Cont.

APPENDIX T0 (Continued)

Table 2 Hourly Rates for 2 Base Multipliers and a Baseline Hourly Rate of \$0.52

Vacancy Rate	Base Multiplier = 2			Base Multiplier = 2.5		
	Multiplication		Hourly Rate	Multiplication		Hourly Rate
	Formula	Value		Formula	Value	
Above 30%	τ_0	1	\$0.52	$\tau_{\tau=0}$	1	\$0.52
25% to 30%	τ_1	2	\$1.04	$\tau_{\tau=1}$	2.5	\$1.30
20% to 25%	τ_2	4	\$2.08	$\tau_{\tau=2}$	6.25	\$3.25
15% to 20%	τ_3	8	\$4.16	$\tau_{\tau=3}$	15.625	\$8.13
10% to 15%	τ_4	16	\$8.32	$\tau_{\tau=4}$	39.0625	\$20.31
5% to 10%	τ_5	32	\$16.64	$\tau_{\tau=5}$	97.6563	\$50.78
Below 5%	τ_6	64	\$33.28	$\tau_{\tau=6}$	244.1406	\$126.95

$$\tau_{\text{HourlyRate}} = \tau_{\text{BaselineHourly}} \times (B^{(30-V)/5}), \text{ for } V < 30; \tau_{\text{BaselineHourly}}, \text{ otherwise (Eq. 2)}$$

where:

- $\tau_{\text{HourlyRate}}$ = the congestion-priced hourly rate to park
- $\tau_{\text{BaselineHourly}}$ = the baseline hourly rate to park, such as \$0.52 per hour (taken from from Eq. 1.
- B = the base of the multiplier being computed, such as 2.50
- V = the vacancy rate percent, such as 17.5, for 7 vacancies in a cluster of 40 spaces, $100*(7/40) = 17.5$

For the example values given, the hourly rate of parking would be \$9.88 per hour.

Pricing Predictions and Notifications

Drivers will develop strategies for their routine trips. The computer system that keeps records of parking use will also provide help for users. The *Intelligent Parking* website will direct a user to an appropriate cluster of parking if the user provides the destination location or locations, the time and date, and the hourly rate they wish to pay. If the walk is going to be long, the website could suggest using transit to get from the cheaply-priced parking to the destination. In such cases, the website may also suggest using transit for the entire trip.

Another user option is to specify the time, location, and the distance the user is willing to walk. In this case, the computer would give the cheapest cluster of parking available at the specified walk distance. The price prediction would be provided.

All price predictions would also have a probability of correctness associated with them. If a user can show that a computer has predicted a much lower price than what actually occurred, with a sufficiently high probability, it would be reasonable to charge the user the predicted price rather than the actual price.

Websites could routinely inform viewers when occupancy rates are expected to be unusually high, due to a special event (for example, a sporting event). The parking system website will always give current and predicted hourly rates for all locations. The hourly rates of parking will

also be available at a phone number and possibly at pay stations. The base-price hourly rate, for any parking cluster, would be stable and could therefore be shown on signs. Parking garage entrances could have large video screens showing both predicted and existing price. Users will also learn to look at parking and judge whether congestion pricing applies, or could apply, while their car is parked. It would not be long before these capabilities are added into GPS navigation systems.

Prepaid RFID

To be inclusive, pay stations or convenience stores will offer a pre-paid RFID that can be set on the dashboard of a car. This will support drivers with poor credit or drivers who have not obtained the necessary equipment to support the normal, trouble-free methods. This will also work for drivers that do not trust the system to protect their privacy for a certain trip (by removing or disabling the permanent RFID) or for all trips. No billing would occur.

Enforcement

The system would notify the appropriate law enforcement agency if an unauthorized car was parked. Authorized cars would need either a pre-paid RFID or equipment indicating that their owners had *Intelligent Parking* accounts and were sufficiently paid up on their bills.

IMPLEMENTATION

This description of *Intelligent Parking* will help to implement efficient parking systems. Parking at train stations, schools, and government buildings could introduce many of these concepts. This description of *Intelligent Parking* is sufficient to support a "Request for Proposal" process, which could lead to full implementation. Widespread installation should be done by a government agency, to minimize actions required on the part of the private sector. Laws would simply require the cooperation of all private-sector and government entities.

SUMMARY

A parking plan, *Intelligent Parking* has been described.

1. Technology will make it easy to use for most drivers.
2. Its parking is almost always shared, to support mixed uses.
3. It unbundles cost by charging and having earnings go to the parking beneficiaries.
4. Traditional groups, such as single-family home owners, employees, tenants, train riders, and students benefit from parking. The benefit is equal for drivers and non-drivers.
5. Baseline prices are computed primarily from the value of the parking and an agreed-upon rate of return. On-street parking is free until it is half full, at which time its base price often matches that of the closest off-street parking.
6. For all parking, price is dynamically increased to guarantee availability. Earnings are therefore only limited by what people are willing to pay.
7. Technology helps drivers find parking and decide if they want to drive or use transit.
8. Prepaid RFIDs provide service to those who have poor credit or don't want to be billed.
9. Disabled and perhaps low-income drivers will have accounts that allow them to park at reduced prices and perhaps avoid congestion pricing. Specially designated spots might also be required for disabled drivers.

1179-13
Cont.

APPENDIX T0 (Continued)

10. The system will provide reports showing where additional parking would be a good investment and where it would be wise to convert existing parking to some other use.
11. Privacy will be protected. Law enforcement officials would need a search warrant to see where someone's car has been parked. The level of detail on billing would be selected by the car's owner.
12. Implementations could begin in carefully selected locations and expand.

Global warming, air pollution, trade deficits, and fairness are some of the significant reasons that governments have a responsibility to implement *Intelligent Parking*.

ACKNOWLEDGEMENTS

The following people have offered encouragement, specific information, and/or special insights.

Dr. Dennis Martinek, Oceanside Planning Commissioner; Sandra Goldberg, California Deputy Attorney General; Jerry Kern, Oceanside, City Council; Amy Volzke, Principal Planner, City of Oceanside; Dr. Nilmini Silva-Send, Senior Policy Analyst of the Energy Policy Initiative Center; Diane Nygaard, Director of Preserve Calavera and founder of Nelson Nygaard, Consulting Associates; Lisa Rodman, Trustee, Carlsbad Unified School District; Dr. Michael McQuary, President, La Jolla Democratic Club; Joan Bullock; Judy Jones, San Diego County Central Committee, California Democratic Party; Patrick Siegman, Principal and Shareholder, Nelson Nygaard; Andy Hamilton, San Diego Air Pollution Control District; Renee Owens, Conservation Chair, San Diego Sierra Club; Caroline Chase, Executive Committee Chair, San Diego Sierra Club; Ed Mainland, Co-Chair, Energy-Climate Committee, Sierra Club California; Bern Grush, Chief Scientist, Skymeter Corporation; and the following San Diego Area Government (SANDAG) employees: Susan Baldwin, Senior Regional Planner; Bob Leiter, former Director of Land Use and Transportation Planning; Coleen Clementson, Principle Planner; and Stephan Vance, Senior Regional Planner.

REFERENCES

- 1 Siegman, P. *How to Get Paid to Bike to Work: A Guide to Low-traffic, High-profit Development; Pro Bike Pro Walk Resource Book*; from the Ninth International Conference on Bicycle & Pedestrian Programs; Sept. 3-6, 1996, Portland, Maine; Bicycle Federation of America Pedestrian Federation of America; pp 171-175.
- 2 Adams, T.; Eaken, A.; Notthoff, A.; *Communities Tackle Global Warming, A Guide to California's SB 375*, June 2009, NRDC; <http://www.nrdc.org/globalWarming/sb375/files/sb375.pdf>.
- 3 Anders, S. J.; De Haan, D. O.; Silva-Send, N.; Tanaka, S.T.; Tynner, L.; *San Diego County Greenhouse Gas Inventory*, September 2008. <http://www.sandiego.edu/epic/ghginventory/>
- 4 Silva-Send, N.; *Reducing Greenhouse Gases from On-Road Transportation in San Diego County*, October 2009. http://www.sandiego.edu/epic/ghgpolicy/documents/ES_GHG_Policy_On-Road_FINAL.pdf
- 5 Shoup, D. *The High Cost of Free Parking*. Chicago University Press, June 7, 2005.

KEYWORDS

A&WMA, Parking, Unbundled, Shared, TDM, cash-out, pricing, beneficiary, greenhouse gas, GHG, GPS, RFID

1179-13
Cont.

APPENDIX T0 (Continued)

Equitable and Environmentally-Sound Car-Parking Policy at a Work Site

By Mike Bullock mike_bullock@earthlink.net

Aug. 30, 2015

Introduction

This paper describes a parking policy that distributes the benefit of parking to all employees, regardless of how often they choose to drive. It does this by

- Charging a fair price for the parking, per unit of time parked, and by
- Giving the total earnings (*total parking-lot earnings*) to the employees, such that each employee's share of the *total parking-lot earnings* is proportion to the time they spend at the work site served by the parking.

The following, additional, optional action would guarantee that no driver loses money under the policy:

- Adding a *must-drive bonus* to each driver's share of the *parking-lot earnings*, if it happened that their share of the *parking-lot earnings* is less than their parking-lot charge. This means that the employee's *must-drive bonus* would be equal to their *parking-lot charge* minus their share of the *parking-lot earnings*.

If an employer decided to pay a *must-drive bonus* to its employees, it would be possible to allow employees to effectively "opt out" of the program so they would not need to be mailed the car-parking statements. The system would feel like "free parking" to them.

Reference 1 describes a more comprehensive policy that will efficiently and conveniently unbundle the cost (or the benefit) of parking in all circumstances. It is available at the following URL: <http://sierraclub.typepad.com/files/mike-bullock-parking-paper.pdf>.

The system described herein is less complex because it does not include congestion pricing, price predictions, or policies that are unique to on-street parking. These features can be eliminated, because it is assumed that there will be an adequate supply of parking, so no congestion pricing is needed; that the price can be relatively stable, so no price predictions are needed; and finally, that employees can be successfully required to park only in their employee parking, so there is no need for new, on-street parking policies, designed to protect adjoining neighborhoods from the intrusion of additional parked cars. If the adjoining neighborhoods had permit parking with a 2-hour limit for cars with no permit, very few employees would ever park in those neighborhoods, in any case.

I179-13
Cont.

APPENDIX T0 (Continued)

Rationale

This system of “unbundled parking cost” will allow all stakeholders to see the actual value of the parking. It will reduce single-occupancy driving to work. Less driving will reduce traffic congestion, air pollution and greenhouse gas (GHG) emissions.

Parking is expensive to provide. Therefore, if no parking had been provided, the saved money could have been invested to increase employee salaries. The method described in this paper allows employees to gain some of that lost salary back, by driving less.

Providing free or underpriced parking only benefits employees that would drive every day, even if they had a method to recover some of their lost salary.

Methods

The parking is operated on the behalf of the employees, as if it were their own business. Those that drive to work are therefore their own customers.

Charge for parking is proportional to time parked and is charged to the employee associated with the car. (A charge rate that is acceptable to all must be established.) For example, if sixty cents per hour is selected, the charging software could round off the parking duration time to the nearest minute and apply a one-cent-per-minute charge. The data-collection method could be implemented with RFID's on cars being detected at parking-lot entrances and exits. Unauthorized cars coming into the employee parking facility would be identified with license-plate detection and, if a car belonging to a felon is driven into the parking lot, a warning notice could be sent to authorities, if this is desired by the company leaders.

Earnings (net revenue, minus the cost of collection and distribution) are given to the employees; in proportion to the time they spend at the work site. This could be based on an employee's schedule or, for more accuracy, could be based on “time-at-the-work-site” data, collected using personal radio frequency identification units (RFIDs) and detectors that are tied to a central, implementing computer. The variables used to compute the amount of money to be paid to an employee are shown in Table 1. The corresponding formula is shown in Figure 1.

Parking statements are automatically sent out monthly, showing the individual's charges and earnings. If desired, the statements could include a *must-drive bonus*, so that no driver loses money under the system. The *must drive bonus* would probably need to come from funds available for employee compensation.



1179-13
Cont.

APPENDIX T0 (Continued)

Implementation

Since this is a new system, it would be prudent for the company leaders to have the vendor take the full responsibility for operating the system, for the first 10 years. This arrangement would ensure that the vendor would debug the system and continue to look for operational efficiencies, over the 10 year period. A sliding scale of vendor-compensation could be specified in the contract, as follows: The vendor could operate the system for 10% of the revenue, for the first 5 years; 5% of the revenue, for the next 3 years; and 2% of the revenue, for the final 2 years. For example, if it is assumed that, on average, 600 cars are parked for 8 hours, for 200 days per year, at a rate of 50 cents per hour, then the yearly revenue would be \$480,000 per year. The vendor would therefore collect \$240,000 over the first 5 years, \$72,000 over the next 3 years, and \$28,800 over the last two years. Figure 2 shows contact information and excerpts of received emails, from a San Diego vendor. This vendor has stated that the design and installation of a fully-automated system would be easy to perform.

Table 1 Variables Used to Compute an Employee's Monthly Earnings

Definitions to Compute an Employee's Monthly Earnings	
$T_{Employee}$	The Employee's Monthly Time at the Work Site
$T_{AllEmployees}$	Total Monthly Time at the Work Site, All Employees
$E_{AllEmployees}$	Total Monthly Earnings from the Employee Parking

Figure 1 Formula Used to Compute an Employee's Monthly Earnings

$$E_{Employee} = T_{Employee} * (E_{AllEmployees} / T_{AllEmployees})$$

Introducing a New Price Differential, for Driving, Compared to Not Driving

Table 2 shows that introducing a price differential into the choice of how often to drive will decrease the amount of driving.

Other Benefits

Depending on the work site's location and the size of its access roads, there could be a substantial decrease in local congestion, improving the health of all employees and those living near the congestion. This parking policy will show neighbors that the company is working to be a good citizen. This program will encourage active transportation, meaning

1179-13
Cont.

APPENDIX T0 (Continued)

modes that provide exercise for the employees. It will also teach the employees the value of parking. It is recommended that the method of determining the selected rate of charge be shared with both the employees and the community at large. This program can be thought of as a demonstration project of a new approach to parking.

Figure 2 One Set of Identified-Vendor Information

<p>David R. Carta, Ph.D., CEO TELAERIS Inc. Innovative Solutions and Rapid Development 9123 Chesapeake Dr., San Diego, CA 92123 +1.858.627.9708 : Office +1.858.627.9702 : Fax +1.858.449.3454 : Mobile e-mail: David.Carta@Telaeris.com skype: davidcarta</p>	<p>I reviewed your Intelligent Parking proposal and presentation in their entirety. The identification of vehicles which you suggest for student parking using commercially available RFID technologies is a fairly straight forward process. There are numerous, inexpensive passive (no battery required) RFID tags which have been specifically designed for use on cars and trucks. These tags are installed directly on license plates or windshields, can be read from up to 30 meters away, and can be read as cars drive up to 60 mph. Additionally, automatic license recognition systems, used in conjunction with RFID, can provide a high level of enforcement making it difficult to cheat the system, similar to the Fast Track system which allows tolls to be automatically collected.</p> <p>This is not too tough - we probably would integrate with a service that already sends physical mail from a electronic submission instead of re-inventing this wheel.</p>
---	--

1179-13
Cont.

Green House Gas Impacts

S-3-05 is a California Governor's Executive Order to drop the state's Year 2020 levels of greenhouse gas (GHG) emissions to the state's level of 1990 emissions and to drop the state's Year 2050 level of GHG emissions to 80% *below* the state's 1990 levels. If the world were to achieve similar reductions, the earth's level of atmospheric CO2 would be capped at 450 parts per million (PPM). Figures 3, 4, and 5 show how large 450 PPM is, compared to values over the last 800 thousand years. Reference 2 shows that the goal of S-3-05 is to limit atmospheric CO2 to 450 PPM and it also shows that even if this cap is achieved, the risk of a human catastrophe caused by global warming is significant. Reference 3's Figure 1 shows that a significant reduction in driving is critically needed.

Conclusion

Adopting this program would benefit the employer, the employees, and the community, in many ways. They will all gain an added understanding of economics, technology, and the power of the free-market principle that sometimes it is better to have people pay for what they use and not force people to lose money for something they don't use. All the members

October 4, 2014

Page 4

APPENDIX T0 (Continued)

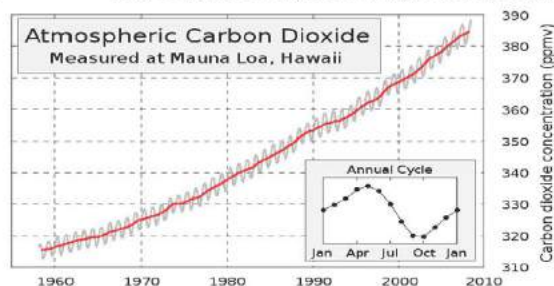
of the work-place community could take pride in being part of this pioneering effort to reduce driving and greenhouse gas emissions. It would be a demonstration of the fundamental features of Reference 1. It would set an example for other employers.

Table 2 **Eleven Cases of Pricing Impact on the Amount of Driving**

Impact of Financial Incentives on Parking Demand			
Location	Scope	1995 dollars per mo.	Parking Use Decrease
Group A: Areas with little or no public transportation			
CenturyCityDistrict, West Los Angeles	3500 employees at 100+ firms	\$81	15%
Cornell University, Ithaca, NY	9000 faculty & staff	\$34	26%
San Fernando Valley, Los Angeles	1 employer, 850 employees	\$37	30%
Costa Mesa, CA		\$37	22%
Average for Group		\$47	23%
Group B: Areas with fair public transportation			
Los Angeles Civic Center	10000+ employees, several firms	\$125	36%
Mid-Wilshire Blvd., Los Angeles	1 mid-size firm	\$89	38%
Washington DC Suburbs	5500 employees at 3 worksites	\$68	26%
Downtown Los Angeles	5000 employees, 118 firms	\$126	25%
Average for Group		\$102	31%
Group C: Areas with good public transportation			
University of Washington, Seattle Wa.	50,000 faculty, staff & students	\$18	24%
Downtown Ottawa, Canada	3500+ government staff	\$72	18%
Bellevue, WA	1 firm with 430 employees	\$54	39% ¹
Average for Group, but not Bellevue Washington		\$45	21%
Over All Average, Excluding Bellevue Washington			25%
¹ Parking vacancy would be higher! ² Not used, since transit & walk/bike facilities also improved.			

I179-13
Cont.

Figure 3 **Atmospheric CO2, Increasing Over Recent Decades**



October 4, 2014

Page 5

APPENDIX T0 (Continued)

Figure 4 Atmospheric CO₂ and Mean Temperature, 800,000 Years Ago, with 450 PPM CO₂ Shown

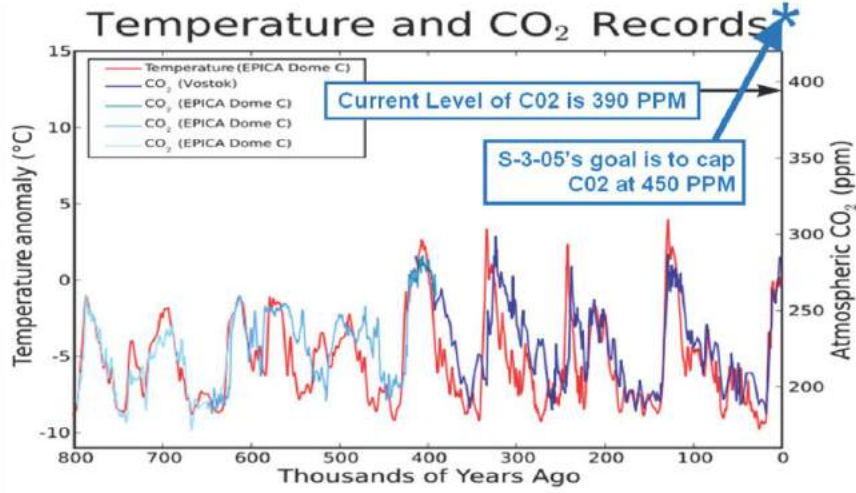
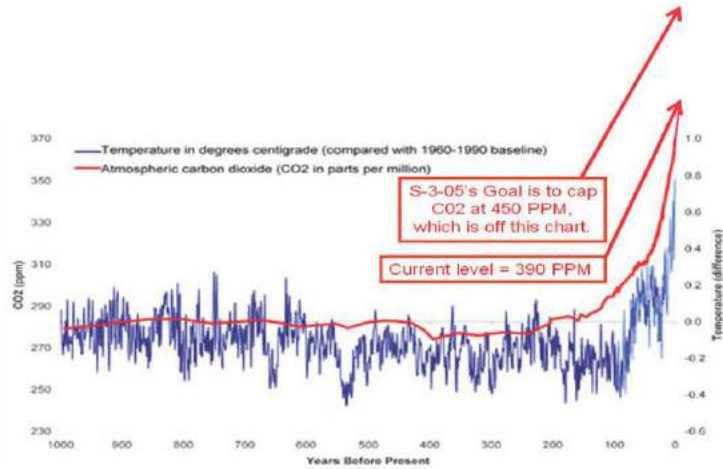


Figure 5 Atmospheric CO₂ and Mean Temperature, Over the Last 1,000 Years



October 4, 2014

Page 6

1179-13
Cont.

APPENDIX T0 (Continued)

References

- 1.) *A Plan to Efficiently and Conveniently Unbundle Car Parking Costs*, Paper 2010-A-554-AWMA of the proceedings of the 103rd Conference and Exhibition of the Air And Waste Management Association; Mike R. Bullock and Jim R. Stewart, PhD; presented on June 22nd, 2010. <http://www.sandiego.gov/environmental-services/pdf/sustainable/parkingcosts.pdf>.
- 2.) Letter from *Center for Biological Diversity*, to Elaine Chang, Deputy Executive Officer of Planning, Rule Development, and Area Sources of the South Coast Air Quality Management District; *Comments on CAPCOA's Conceptual Approaches Regarding Potential Significance Thresholds for Greenhouse Gas Emissions*; April 17, 2008. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-1/ghg-meeting-1-comment-letter-center-for-biological-diversity.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-1/ghg-meeting-1-comment-letter-center-for-biological-diversity.pdf)
- 3.) *Communities Tackle Global Warming*, Tom Adams (California League of Conservation Voters), Amanda Eaken, and Ann Notthoff (Eaken and Notthoff are employees of the Natural Resources Defense Council); June 2009. <http://www.nrdc.org/globalwarming/sb375/files/sb375.pdf>



1179-13
Cont.



1179-13
Cont.

**Transformative Climate
Communities Program**
DRAFT SCOPING GUIDELINES



NOVEMBER 2016

APPENDIX T0 (Continued)

TABLE OF CONTENTS

I.	INTRODUCTION	3
A.	BACKGROUND.....	3
B.	WHAT IS A TRANSFORMATIVE CLIMATE COMMUNITY?.....	3
C.	PROGRAM SUMMARY.....	3
II.	PROGRAM REQUIREMENTS	4
A.	ELIGIBILITY.....	4
B.	PRIMARY OBJECTIVES.....	5
C.	PERFORMANCE CRITERIA.....	5
III.	APPLICATION PROCESS	7
A.	IMPLEMENTATION GRANTS.....	7
B.	PLANNING GRANTS.....	9
IV.	TECHNICAL ASSISTANCE & SUPPORT	10

↑
1179-13
Cont.
↓

DRAFT

APPENDIX T0 (Continued)

Draft Scoping Guidelines: Transformative Climate Communities Program

These Draft Scoping Guidelines for the Transformative Climate Communities Program are being made available for public comment. This scoping document does not represent the full Draft Guidelines for the program, but is intended to provide an initial framework. The Strategic Growth Council (SGC) recognizes that many areas presented in the document require additional work and discussion, and we look forward to public input to help inform development of the Draft Guidelines.

Comments are due to SGC by 5:00pm on January 9, 2016.

Please submit comments to:

tccpubliccomments@sgc.ca.gov

or:

Strategic Growth Council
ATTN: Mackenzie Wieser
1400 Tenth Street
Sacramento, CA 95814

SGC plans to release the Draft Guidelines for the Program in late January or early February of 2017. Release of the Draft Guidelines will be accompanied by multiple public workshops throughout the state as well as additional public comment periods to inform development of the Program.



1179-13
Cont.



APPENDIX T0 (Continued)

I. INTRODUCTION

A. BACKGROUND

Assembly Bill 2722 established the Transformative Climate Communities Program, administered by the SGC, to "...fund the development and implementation of neighborhood-level transformative climate community plans that include multiple, coordinated greenhouse gas emissions reduction projects that provide local economic, environmental, and health benefits to disadvantaged communities as described in Section 39711 of the Health and Safety Code." (Pub. Resources Code § 75240.)

The Transformative Climate Communities Program (Program) will accelerate greenhouse gas reduction and advance local climate action in disadvantaged communities through an integrated, community-based approach. The Program is an opportunity to realize the State's vision of [Vibrant Communities and Landscapes](#), demonstrating how community engagement coupled with strategic investments in transportation, housing, energy, natural resources, and waste can reduce greenhouse gas emissions and other pollution, while also addressing growing equity issues and enhancing economic opportunity and community resilience.

Strong local engagement and cross-sector partnerships are critical to realizing this vision. In addition to reducing greenhouse gas emissions, the Program will serve as a model for catalyzing local, multi-sector partnerships that leverage private and public funds to sustain community revitalization and equitable development, while meeting the State's climate goals.

B. WHAT IS A TRANSFORMATIVE CLIMATE COMMUNITY?

Transformative climate communities integrate building and infrastructure projects with community-driven, multi-sector partnerships that reduce greenhouse gas emissions, increase climate resiliency, expand economic opportunities, and reduce health, environmental and social inequities to create beautiful places with equitable access.

The SGC anticipates making substantial, concentrated investments in communities, but recognizes this is but one piece of a truly transformative effort. In partnership with the SGC, awarded applicants will use the state investment in concert with multiple related efforts driven by community engagement, which may include additional financing, philanthropic funding, parallel and connected capital investments, business and workforce development projects, public health programs, K-12 and higher education programs, career and technical training, entrepreneurship support, volunteer programs, civil society projects, and other efforts associated with community-wide transformation.

Applicants must develop an integrated plan with measurable goals, and demonstrate the community leadership, human and social capital, and internal and external accountability needed to monitor a set of criteria that become core and ongoing components of transformation.

B. PROGRAM SUMMARY

The Program will award competitive funding totaling approximately \$140 million in Implementation Grants for the implementation of transformative, neighborhood-level plans in three communities. Through a complimentary program, the SGC will also award approximately \$1.5 million in Planning

1179-13
Cont.

APPENDIX T0 (Continued)

Grants in up to ten communities, intended to facilitate community readiness for future implementation funding through State and/or other sources.¹

On September 23, 2016, the SGC released a Notice of Proposed Rulemaking to allocate a minimum of half of the Implementation Grant funds in the City of Fresno, a minimum of one-fourth in the City of Los Angeles, and the remaining Implementation Grant funds in a third location to be determined.

The SGC may award grants over multiple years and prioritize investment in the State's most disadvantaged communities.

The SGC intends to seek long term funding for the program. With this initial appropriation, the SGC hopes to provide diverse models of neighborhood-level transformation that can be studied, replicated and adapted based on measured outcomes that include not only deep greenhouse gas reduction, but also the maximization of climate, public health, environmental, workforce and economic benefits.

II. PROGRAM REQUIREMENTS

The Program seeks well-organized communities that demonstrate multi-sector partnerships capable of governing and implementing a transformative vision for a designated area, including integrated projects that will achieve **all** of the Primary Objectives and Performance Criteria listed below.

A. ELIGIBILITY

1. Eligible applicants may include but are not limited to: nonprofit organizations, community-based organizations, faith-based organizations, coalitions or associations of nonprofit organizations, community development finance institutions, community development corporations, local governments, joint powers authorities, and/or tribal governments.
2. Joint applications including multiple entities are strongly encouraged, and must include the identification of a lead applicant and co-applicants.
3. Applicants must demonstrate capacity and readiness to implement coordinated projects, including:
 - i. Ability to govern and implement large infrastructure projects, including evidence of past performance, letters of support from local and/or regional governments, and the ability to work with multiple levels of government as needed for project implementation.
 - ii. Evidence of diverse community support, such as from elected officials, key stakeholders, community foundations, state, regional and local government agencies, local health departments, community groups, and private partners.
 - iii. Partnerships that provide the ability to attract and leverage additional public, private, and philanthropic funding.
 - iv. Partnerships that ensure the ability to collect data and analyze outcomes over time; support from universities and community colleges for data collection and analysis are encouraged.
4. Applicants must demonstrate alignment with one or more up-to-date, adopted community or neighborhood plan for the targeted area of investment that reflect best practices in sustainable development and community revitalization, and reflect comprehensive and documented

1179-13
Cont.

¹ Planning grants will be funded through SGC's Sustainable Communities Planning Grants and Incentives Program.



APPENDIX T0 (Continued)

community engagement. Priority will be given to proposals that prioritize focused implementation of:

- a. Specific plans for multi-modal hubs that prioritize district-scale and regional transit and active transportation connectivity to employment and service centers.
 - b. Well-integrated plans that coordinate housing, multi-modal transportation connectivity, renewable energy generation, water efficiency, storm water management and other urban greening improvements;
 - c. Physical and programmatic connectivity to low-income and disadvantaged residents to improve access to jobs; workforce development and economic opportunity for low-income and disadvantaged residents; and integration of affordability and equitable access to infrastructure and supportive services for low-income and disadvantaged residents.
5. Applicants from cities within the High Speed Rail Initial Operating Segment must demonstrate that their proposals support implementation of an integrated Station Area Plan.

B. PRIMARY OBJECTIVES

1. **Maximize greenhouse gas emissions reduction.** Develop and deploy integrated projects that accelerate greenhouse gas emissions reduction.
2. **Build, strengthen and sustain local leadership and grassroots engagement in civic and community development.** Forge enduring, multi-sector commitment to local partnerships and community engagement while implementing adopted community, specific, or other local plans.
3. **Implement Sustainable Communities Strategies.** Implement projects that are prioritized in adopted regional Sustainable Communities Strategies, focus on infill development and yield the highest reductions in greenhouse gases.
4. **Improve environmental, social and health equity.** Promote equitable distribution of the benefits and burdens of investment and development, and improve the public health and well-being of residents.
5. **Expand economic opportunity.** Provide access to quality local job opportunities and workforce training through projects, and direct community benefit through economic development and investment opportunities.
6. **Increase resilience.** Invest in projects that increase the resilience of communities, economies, and infrastructure in the face of a changing climate and other pressures.
7. **Leverage funding.** Secure a minimum of 100% match of awarded grant amount through other funding sources.
8. **Quantify and evaluate impacts.** Commitment to monitor performance criteria tied to specific goals, and share data with the State and across community partners.

C. PERFORMANCE CRITERIA

The Performance Criteria support the Primary Objectives, and applicants must implement projects that meet all criteria. For each criterion, applicants must identify a specific goal as well as metrics that can measure performance and ongoing progress toward the goal. Example metrics are included with some of the criteria.

1. **Greenhouse Gas Reduction.** Meet or exceed a path toward long-term emissions reduction that aligns with State goals, including implementation of SB 375. Potential metrics: Baseline and ongoing greenhouse gas emissions inventories consistent with the State's inventory, GGRF quantification methodologies, or other ARB-developed approaches.

1179-13
Cont.

APPENDIX T0 (Continued)

2. *Equitable Development.* Promote equity and opportunity, and ensure equitable distribution of the benefits and burdens of investment and development, including strategies that result in mixed-income neighborhoods where families choose to live and businesses choose to invest. Potential metrics: Percentage of mixed-income housing in the community relative to current poverty rates and concentration of existing subsidized housing; community income diversity; number of jobs that can be accessed by disadvantaged community residents; measured engagement in the community from past and current planning processes.
3. *Community Engagement and Leadership Development.* Demonstrate engagement of community organizations and local stakeholders throughout development and implementation of projects, and provide opportunities for community leadership and input throughout activities and decision-making. Potential metrics: Number and location of community meetings held regarding projects; diversity of perspectives from engaged partners and local residents; contracted partnerships with community-based organizations; establishment of community benefits agreement; other metrics associated with comprehensive, community-driven planning processes that result in environmental clearance and formal adoption of community or specific plans.
4. *Educational and Economic Opportunities.* Develop local “green” jobs for low-income residents, support expansion of local businesses, encourage businesses to locate in the community, attract private investment, promote use of local goods and services, increase availability of and participation in high-performing educational and job training opportunities. Potential metrics: number of jobs created, hours performed by disadvantaged community residents, number of contracts with local businesses, participation in education, apprenticeship and workforce training programs, high school graduation rates, economic output.
5. *Access and Mobility.* Prioritize active transportation facilities and public transit. Accelerate compact development, zero and near-zero emission transportation, as well as non-auto oriented transportation options through first/last mile, safe and accessible biking and walking routes, and safe and reliable transit options. Potential metrics: percentage change of walking, biking and other non-motorized trips, reduction in vehicle miles traveled, implementation of transit-oriented development, pedestrian and cyclist injuries/fatalities.
6. *Anti-Displacement Strategies.* Avoid physical and economic displacement of low-income disadvantaged community residents and businesses. Potential metrics: displacement, metrics associated with implementing pre-emptive policies and commitments by local governments to protect existing residents and businesses.
7. *Criteria Air Pollutant Reduction.* Reduce criteria air pollutants, particularly pollutants that do not comply with current standards or that pose a particular pollution burden to the community, as defined by the Office of Environmental Health Hazard Assessment. Potential metrics: Localized air quality monitoring at the beginning, throughout and after project implementation.
8. *Land Preservation and Restoration.* Promote land conservation that protects habitats, connects migration corridors, provides ecosystem services, and protects agricultural lands, especially those at risk for near-term urban development. Potential metrics: percentage of land preserved, number of species/habitats protected, economic assessment of ecosystem services, percentage of development in greenfield versus urbanized area.
9. *Decarbonized Energy and Energy Efficiency.* Accelerate the State’s zero net energy objectives; minimize the need for new energy infrastructure costs such as transmission and distribution upgrades; implement significant deployment of building retrofits; deploy smart-grid technologies, and support grid reliability and resiliency by incorporating energy storage.

1179-13
Cont.



APPENDIX T0 (Continued)

Potential metrics: change in energy use for low-income and disadvantaged communities; emissions of energy sector.

10. *Urban Greening and Green Infrastructure.* Enhancement and expansion of neighborhood parks and community space; greening of public lands and structures, including incorporation of riparian habitat for water capture and provision of other public and wildlife benefits; green streets and alleyways; non-motorized urban trails that provide safe routes for travel between residences, workplaces, commercial centers, and schools; and urban heat island mitigation. Potential metrics: number of trees planted, green infrastructure elements incorporated into project.
11. *Efficient Water Usage.* Implement greywater and recycling systems; drought-resistant landscaping and permeable surfaces; limit urban growth boundaries based on water availability. Potential metrics: Measured reduction in water use, amount of water-efficient fixtures and appliances.
12. *Materials Management.* Implement projects that reduce waste, including food waste recycling and composting, reduced single-use products, waste-to-energy projects. Potential metrics: Materials recycled, measured reduction in landfill tonnage.
13. *Health and Well-Being.* Improve human health and community well-being; increase access to primary care; provide access to parks, trails, and natural areas as well as access to healthy, local and affordable food, and other opportunities to support socially and economically diverse populations. Potential metrics: birth weight, life expectancy, access to healthy food, other physical and mental health outcomes for low-income and disadvantaged communities.
14. *Climate Resiliency.* Develop projects while considering climate change scenarios and impacts, including more extreme heat days, sea level rise, and more variable water systems. Potential metrics: Infrastructure preparedness for climate change impacts, including buildings designed for extreme heat days; tree canopy, impervious surfaces; as well as human vulnerability and resilience to climate change, including share of population in high risk locations, social cohesion, asthma emergency department visits, violent crime rate, and heat-related illnesses.

1179-13
Cont.

III. APPLICATION PROCESS

A. IMPLEMENTATION GRANTS

Implementation Grants will be awarded through a two-phase competitive process.

1. Concept Proposal
 - i. Applicants must provide a concept proposal describing a vision and plan for district-scale transformation that contains specific goals and metrics, and meets all Primary Objectives and Performance Criteria.
 - ii. Applications must present coordinated and collaborative proposals that encompass multiple, mutually-reinforcing projects and initiatives concentrated within a discrete and focused geographical area.
 - iii. Applicants must identify goals and metrics tied to specific Project Components within a single Project Area.
 - a. *Goals:* goals must be identified for each Performance Criterion, and should be accompanied by a description of how each goal supports the Primary Objectives of the Program.
 - b. *Metrics:* at least one metric must be identified for each Performance Criterion for the purpose of measuring progress toward each criterion and goal. Metrics must be tied to all Project Components.



APPENDIX T0 (Continued)

- c. *Project Components*: Project Components must be identified that result in quantifiable greenhouse gas reductions that provide local economic, environmental and health benefits. Projects should be implementing adopted local land use plans with CEQA clearance to ensure implementation in a timely period. Project Components that are quantifiable through existing GGRF programs are eligible for funding (e.g., an affordable housing and transportation Project Component funded through the Affordable Housing and Sustainable Communities Program). Those that do not have a quantification methodology must be part of a project with a quantifiable component or identify non-GGRF funding.
- d. *Project Area*: a Project Area must be defined by the applicant and should be a focused, concentrated geography ideally encompassing no more than two square miles. A Project Area must include only census tracts that are within the top 5% of disadvantaged communities, per CalEnviroScreen 2.0, or the Project Area's boundaries must align with an existing jurisdictionally recognized neighborhood boundary in which at least 51% of the census tracts are within the top 5%. Priority will be given to project areas that encompass significant public infrastructure investment commitments, including major passenger and freight transportation infrastructure hubs. For cities served by the High Speed Rail Initial Operating Segment, priority will be given to projects that concentrate investment within a one-mile radius of the station.
- iv. Applicants must demonstrate proof of a community engagement process, form the necessary partnerships for integrated projects, identify opportunities for collaboration, and ensure that the proposal implements up-to-date, adopted specific plans for the Project Area that have been developed through a documented collaborative, community visioning process with participation by a local government. Examples include specific plans, community plans, station area plans, and neighborhood plans.
- v. Recently adopted community and/or specific plans may serve as the basis for Concept Proposals.
- vi. Budget: applicants must provide a proposed budget containing estimated total project costs, including a breakdown of costs and proposed sources of funding (in addition to Program funding) for each Project Component.
 - a. Project Components funded through GGRF must meet all GGRF criteria. Funding Guidelines for GGRF programs are available at <http://www.arb.ca.gov/cc/capandtrade/auctionproceeds/fundingguidelines.htm>. Additional guidance may be developed by ARB.
 - b. Applicants must demonstrate the extent to which non-GGRF funding sources are leveraged to meet proposed project costs.
- vii. Application scoring and selection:
 - a. Concept Proposals and required supporting documents will be reviewed to assess eligibility and readiness to determine whether an applicant will be invited to submit to the next phase (Full Application). The Concept Proposal is part of the competitive process and as such, all information should be well thought-out and edited for accuracy.
 - b. Applicants will be notified whether or not they are invited to participate in the Full Application Phase. An invitation to apply does not guarantee the project will compete successfully for funding.

1179-13
Cont.

APPENDIX T0 (Continued)

2. Full Application

- i. Those invited to submit Full Applications will further develop their Concept Proposals, including but not limited to:
 - a. Creation of detailed infrastructure and development budgets, and an implementation strategy for all plan components.
 - b. Additional analysis and project development that may be needed to secure project financing.
 - c. Additional detail on how the proposed Project Components address Program Performance Criteria and meet Primary Objectives.
- ii. Invited applicants will work with SGC staff to determine additional establishment, alignment and/or coordination of project governance structures, including local, State and Federal partnerships.
- iii. Project Components funded in whole or part by GGRF funds must demonstrate greenhouse gas emission reductions and other co-benefits. Applicants must submit estimated greenhouse gas emission reductions for all GGRF-funded project components, using ARB-approved quantification methodologies.
- iv. Full Applications are subject to further review and approval by the SGC. An invitation to apply does not guarantee the applicant will compete successfully for funding.
- v. Final Implementation Grant awards shall be determined on a competitive basis based on readiness and a fully developed application.
- vi. Granting of funds is contingent upon the implementation of projects that reduce greenhouse gas emissions.

3. Award Implementation

- i. Applicants must begin project-level implementation within one year of having received an Implementation Grant, and funds may be disbursed over multiple years.
- ii. GGRF funding must be expended within five years of award notification.

4. Outcomes

- i. *Primary Objectives and Performance Criteria.* For each Performance Criterion, applicants must identify goals and metrics to assess those goals towards the achievement of Primary Objectives. Each metric must include a timeline for monitoring and reporting throughout the project for a minimum of 5 years, in addition to any other reporting requirements (e.g., as required by the GGRF Funding Guidelines).
- ii. *Reporting.* Applicants are responsible for fulfilling reporting requirements, which include financial, disadvantaged community benefits, and greenhouse gas reduction reporting annually. Reporting includes estimates at project application and development and measured outcomes as project components are implemented.

B. PLANNING GRANTS

1. Planning Grants are intended to provide funding for those communities needing assistance in developing local plans, policies, partnerships or other efforts aligned with the Program.
2. Eligible applicants include Cities, Counties, Metropolitan Planning Organizations, Joint Powers Authorities, Regional Transportation Planning Agencies, Councils of Governments, or combinations thereof.

1179-13
Cont.

APPENDIX T0 (Continued)

3. The SGC welcomes proposals focused on undertaking a local planning effort aligned with the Primary Objectives and/or Performance Criteria of the Program, as well as the following:
 - i. Be consistent with the State's Planning Priorities, in summary below, and identified in Section 65041.1 of the Government Code. These priorities are intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety in the state, including urban, suburban, and rural communities.
 - a. Promote infill development and equity by rehabilitating, maintaining and improving existing infrastructure.
 - b. Protect, preserve and enhance environmental and agricultural lands and natural and recreational resources.
 - c. Encourage location- and resource-efficient new development.
 - ii. Reduce greenhouse gas emissions, on as permanent a basis as is feasible, consistent with The California Global Warming Solutions Act of 2006 (Division 25.5, section 38500 et. seq. of the Health and Safety Code) and any applicable Regional Plan.
 - iii. Connect state policies or programs, regional planning efforts, and local plans through coordination and collaboration.
 - iv. Promote environmental, social and health equity.
 - v. Apply State of California best practices for climate change vulnerability assessment, resilience planning, and adaptation to the effects of climate change on the proposed project.
4. Applicants must submit a proposed budget and timeline.
5. The SGC may prioritize proposals located within the most disadvantaged communities, as described in Section 39711 of the Health and Safety Code.
6. The SGC may prioritize proposals from designees of Federal place-based initiatives, including the Promise Zone Initiative and the Strong Cities Strong Communities Initiative.
7. The highest scoring applicants will be awarded Planning Grants.
8. Planning Grant recipients may be prioritized for future Program funding, should funding be available, including funding from other GGRF programs.

IV. TECHNICAL ASSISTANCE & SUPPORT

The SGC recognizes that the State's most disadvantaged communities often lack the capacity and institutional resources to seek competitive grants, and may not be prepared to apply to the Program or to develop and implement transformative plans.

We are committed to supporting applicants by offering ongoing outreach, support and technical assistance throughout all phases of the application process to achieve Program outcomes, including before and after the granting of funds.

In addition to statewide outreach conducted by the SGC and partner organizations, grant recipients will be eligible for:

- **Technical Assistance:** The SGC and the California Environmental Protection Agency will partner with third party entities to offer assistance in assessing and integrating planning and implementation efforts, strengthening organizational capacity and developing project priorities.
- **Streamlined Application:** SGC will provide a streamlined set of requirements to facilitate project integration and implementation.



1179-13
Cont.

APPENDIX T0 (Continued)

Draft Scoping Guidelines: Transformative Climate Communities Program

November 23, 2016

- **Financing:** The SGC will partner with other State agencies to coordinate access to financing vehicle(s) (e.g., loan loss reserve, infrastructure financing mechanisms) to attract and leverage additional capital to the extent possible.

↑
1179-13
Cont.

DRAFT



APPENDIX T0 (Continued)

APPENDIX T0 (Continued)

APPENDIX T0 (Continued)

I180 FORSTER, CHRISTINE

Comment Letter I180

From: christine forster <cfforster@att.net>
Date: August 29, 2018 at 5:08:42 PM PDT
To: <council@ci.oceanside.ca.us>
Subject: NRF

I oppose this development for several reasons

Having volunteered at the farmers markets for more than 20 years once farmland is gone you never get it back. Farming is a hard business but for those who love the land still please let them keep it

Traffic I live in oceana I had a vet that was highly recommended to me on vista way in vista.

After going there one time for a 3:45 apt I knew I had to change vets if there were ever a emergency I would really be in trouble it took me 40 min to get to the apt. At that time of day.

Do we really need more development? But then I notice you seem to keep wanting to add more to the El Corazone development too

Do not forget all the homes and apartments you have added by the mission. Mission /76 is going to be a horror getting anyplace

Thank you for your consideration

Christine Forster
3808 vista campana unit 20
Oceanside ca

Sent from my iPad

I180-1

I180-2

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I181 BRAZEL, JOYCE

Comment Letter I181

From: shop4jeb@gmail.com
Sent: Tuesday, September 04, 2018 11:07 PM
To: Robert Dmohowski
Subject: South Morro Hills, San Diego County

Follow Up Flag: Follow up
Flag Status: Flagged

I can not imagine changing an area from around 400 homes to 2300 homes.
We do not even have the water for the homes we already have here.
This is a farming area. It was not meant to be a metropolis!
Don't ruin it for those of us to moved here, for a rural setting and to get away
from the noise and congestion. Temecula is already losing business because the
15 Freeway is so crowded with traffic now that no one wants to go to their
vineyards anymore. Fallbrook water bills are sky-high and our electricity shuts
down on us already or we are fined when we use too much, when the temperature is 101*!
I know a lot of people who are moving to Texas because some people in this state care
more about lining their own pockets than doing what is right for the homeowners in this area.

I 1181-1
I 1181-2
I 1181-3
I 1181-4

Joyce Brazel
Fallbrook, Ca.

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I182 HAMILTON, LISA

Comment Letter I182

From: lisa.hamilton <skilisa@hotmail.com>
Sent: Monday, September 17, 2018 5:36 PM
To: Robert Dmohowski; Zack Beck
Subject: DEIR for N.River Farms

Sirs:

I have many questions about this document. Here are a few I wish could be answered.

1) Fire Risk: **Nowhere is there a fire risk map.** Given the path of the Lilac fire in 2017, this is unacceptable and needs answering. I182-1

2) **Flood plain building on the South side of N. River Road:** Most of the proposed dwellings will be in the flood plain. **How will these people get flood insurance given that flood insurance from the US Government is becoming more and more expensive.** This development is right in a flood plain which in the past has had major floods. Please address this point of flood plain building and insurance availability. I182-2

3) Traffic: Please tell me how a 2 lane road will accommodate all the increased vehicle trips as well as the usual agricultural traffic. Roundabouts and one lane each way cannot accommodate the traffic that will be on this road. Please cite **current traffic studies...not from 2002...** that will justify this project. I182-3

4) The required infrastructure: road widening to 4 lanes, sewer, increased electrical service, increased water use, increased fire and police services should not be the responsibility of the City of Oceanside. This level of residential building is a net cost to the city for this infrastructure and services. **Please cite figures which will show a level of mitigation of these costs.** I182-4

5) **If N. River Road is to be 2 lanes with roundabouts, please explain evacuation plans for fire.** The area where the Lilac Fire burned would have burned through this development had it not been for plowed ground stopping the fire's advance. **EVACUATION IS CRITICAL FOR THIS AREA.** A one lane road in each direction with roundabouts will NOT allow for rapid evacuation. **Explain plans for evacuation.** I182-5

6) In case of one lane road in each direction, where **would bicycle traffic go? Please explain.** This was not included in the DEIR. I182-6

7) Water: **Please detail how much water would be needed for this number of homes and where this water would come from.** Almost 700 homes will use much more water than the current agricultural use. I182-7

These are only some of the questions the DEIR raised for me. This document is woefully incomplete and unfair to the people of the City of Oceanside. These questions need to be answered, not just glossed over. I182-8

Lisa Hamilton
323 S. Ditmar St.
Oceanside, CA 92075

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I183 COBAS, MICHAEL AND SUSAN

Comment Letter I183

From: Susan Cobas <scobas@aol.com>
Sent: Monday, September 17, 2018 8:21 PM
To: Robert Dmohowski
Subject: Integral Draft Environmental Impact Report

I would like to add my voice to the concerns you have already received about this project.

For all of the arguments and concerns already and repeatedly expressed, I am also opposed.

It is particularly discouraging that the developers have been able to get (buy) their way this far with a concept so far out of reach and touch with what the City needs and wants.

I am hopeful that this project can be put on the shelf where it belongs.

Michael and Susan Cobas
1539 Sleeping Indian Road
Oceanside

I
|
I183-1
|
I

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I184 SOTIRE, TRISHA

Comment Letter I184

From: Trisha Sotire <trishasotire@icloud.com>
Date: August 23, 2018 at 4:32:23 PM PDT
To: <council@ci.oceanside.ca.us>
Subject: North River Farms Development

Dear Oceanside City Council,

I am writing you in opposition of the development at North River Road. I am extremely concerned about the number of homes that would be added to this area. Without proper infrastructure in place first, the congestion & traffic is going to increase substantially. The increase in traffic will impact the entire area on a daily basis, and also in times of emergencies. During the fire in 2017, it took 1 1/2 hours to move from Douglas & Vandergrift to college & 76. The North River Road & Vandergrift intersection as well as the bridge over the river on College were major choke points. Had the fire spread more quickly to this area, the results would've been devastating.

I184-1

I184-2

I understand that development will naturally occur over time. What I am asking for is that our city approves only responsible development. Development that adds value to our city, not development that adds gridlock traffic. Build the infrastructure first. Please learn from the mistakes of Temecula and Los Angeles.

I184-3

We have a very special city. Responsibly, we can maintain a wonderful city!

Sincerely,

Trisha Sotire
1149 Championship Road
Oceanside, CA 92057
(619)306-3363

Sent from my iPhone

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK

APPENDIX T0 (Continued)

I185 JOHNSTON, KAREN

Comment Letter I185

Robert Dmohowski

From: Karen Johnston <karejohnston@gmail.com>
Sent: Monday, September 17, 2018 4:26 PM
To: Robert Dmohowski; City Council
Subject: Comments on the DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE NORTH RIVER FARMS PLANNED DEVELOPMENT PLAN

Comments on the Draft Environmental Impact Report for the North River Farms Planned Development Plan (SCH # 2017111069)

My name is Karen Johnston, I live at 1544 Sleeping Indian Road in the South Morro Hills area of the city of Oceanside. I have many concerns about this possible development project, but my primary concern is the impact on wildlife in the area.

I was shocked to see that professional biologists noted only 13 species in the Wildlife Compendium while they were performing field studies on the 178 acre proposed development. I have casually observed over 50 species of wildlife in my 3 acre yard. I would expect to see many more than 13 species noted in the project area, which is so much larger than my yard and which is bordered by the excellent habitat along the San Luis Rey River. This certainly calls into question the validity of the wildlife survey, and should be critically reviewed by competent wildlife professionals.

I am concerned about the validity of this DEIR because in Appendix E: Biological Resources Technical Report, Section 3.32 Fauna, the report notes that "No focused surveys for special-status wildlife were conducted due to the placement of development greater than 100-feet away from potential habitat (with the exception of a small area of road improvements) and due to lack of suitable habitat for special-status species within the project site. However, during surveys all wildlife species detected during the field surveys by sight, calls, tracks, scat or other signs were recorded." This explains why so few species were recorded in Appendix B, the Wildlife Compendium.

This is especially disturbing to read, as in the DEIR Appendix A, Public Scoping Comments, the State of California Department of Fish and Wildlife (CDFW) notes the following about the Draft Environmental Impact Report:

"4. The document should provide a **complete** assessment of the flora and fauna **within** and **adjacent** to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a **complete** floral and faunal species compendium of the entire project site..."

"4b. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite."

May I note that if you do not actively look for wildlife, you are not likely to find it.

Even without a formal survey, the following Special Status Species have been noted on DEIR Table D-1 to be within approximately 1 mile of the project. They will certainly be affected by a large development being built near or within their foraging area and/or habitat.

Agelaius tricolor, tricolored blackbird (nesting colony) CDFW data-- 0.7 miles away
Empidonax traillii extimus, southwestern willow flycatcher (nesting) CDFW data-- 100 feet away
(The southwestern willow flycatcher has both Federal endangered and State endangered status)
Icteria virens, yellow-breasted chat (nesting) CDFW data-- 0.6 miles away
Poliophtila californica californica, coastal California gnatcatcher CDFW data-- 1.0 miles
Setophaga petechia, yellow warbler (nesting) CDFW data-- 0.6 miles away
Vireo bellii pusillus, least Bell's vireo (nesting) CDFW data-- 0.5 miles away

APPENDIX T0 (Continued)

(The least Bell's vireo has both Federal endangered and State endangered status)

Dipodomys stephensi, Stephens kangaroo rat CDFW data-- 1.1 miles

(Stephens kangaroo rat has both Federal endangered and State threatened status)

To be clear, this DEIR does not include a complete Biological Assessment which should be required. A complete survey would certainly record more species for the Wildlife and Plant Compendiums and quite possibly record more special status species within the proposed development and/or adjacent habitat. Of particular interest is some very suitable habitat in the Hardline Preserve Area of the San Luis Rey River which is adjacent to all of the southwestern and southeastern borders of the proposed development .

I am opposed to The North River Farms development. It will be detrimental to the wildlife in the area, as well as the residents of Oceanside. Neither the wildlife nor people need more traffic on congested roads and highways, or an excessive amount of housing in an agricultural area. The city of Oceanside will not benefit from more cars on rural roads, more traffic on Highway 76, more congestion in emergency evacuation situations, more citizens using the already limited supply of water, and more residents requiring civic support such as fire stations, schools and police patrols.

↑ 1185-5
Cont.

1185-6

1185-7

APPENDIX T0 (Continued)

I186 JOHNSTON, PHIL (2)

Comment Letter I186

Robert Dmohowski

From: Phil Johnston <pfjohnston@runbox.com>
Sent: Monday, September 17, 2018 10:22 AM
To: City Council
Cc: Robert Dmohowski
Subject: Re: North River Farms proposed project needs to be rejected

Follow Up Flag: Follow up
Flag Status: Completed

Dear Oceanside City Council Members:

Thank you for making the proposed North River Farms project Draft EIR available for review. The Draft EIR shows that the proposed project's basic objectives violate the City of Oceanside's existing General Plan for land use, as well as existing zoning ordinances. This makes the project untenable. The project should be rejected, unequivocally. It cannot be "tweaked" or modified to become acceptable when there is a fundamental disconnect between the project objectives and the city's General Plan and ordinances.

I186-1

Details are below. I would be happy to discuss if you have any questions regarding this correspondence.

Best Regards, Phil Johnston

Section 3.2 of this draft EIR clearly shows the objectives are in conflict with the existing City of Oceanside General Plan for land use for this area. Among the most obvious problems is Objective #2: "Provide for varying housing densities and diverse housing types...." (Table ES-2 shows up to 15 residences per acre). These objectives are proposed even though the General Plan assigns this area to agricultural use, with zoning for a maximum housing density of one house per 2.5 acres (0.4 residences per acre).

I186-2

The glaring disconnect between the proposed project objectives and the long-standing and well-thought-out General Plan for land use makes this proposal "Dead on Arrival". To proceed would make a complete farce of the General Plan for land use, as well as the concept that zoning ordinances have meaning and purpose, and need to be followed.

I186-3

If the project proposer desires to redo this proposal so it can proceed through the system, I believe two approaches might be available:

I186-4

1) Reconfigure the project to be consistent with the existing General Plan for land use (agriculture) as well as zoning ordinances (minimum 2.5 acres per lot) long in place for the area (This possibility is alternative ES.7.2 of the draft EIR).

2) Delay the project until such time as the General Plan for land use has been modified, to change the current agricultural land use specification to the urban land use densities being sought for this project by it's promoters.

I186-5

Obviously these types of changes to the General Plan would need to be carefully considered, and would need to include and respect the input of the citizens of the city as well as the expert guidance of appropriate advisory bodies.

I186-6

If the project promoter desires to continue pursuing this, the Draft EIR must be completely reworked to have objectives and a project configuration which are not in conflict with the existing General Plan for land use.

I186-7

APPENDIX T0 (Continued)

INTENTIONALLY LEFT BLANK