

APPENDIX A

Public Scoping Comments



State of California • Natural Resources Agency
Department of Conservation
Division of Land Resource Protection
801 K Street • MS 14-15
Sacramento, CA 95814
(916) 324-0850 • FAX (916) 327-3430

Edmund G. Brown Jr., Governor
Kathryn M. Lyddan, Division Director

December 21, 2017

VIA EMAIL: RDMOHOWSKI@CI.OCEANSIDE.CA.US

Mr. Rob Dmohowski, Associate Planner
City of Oceanside, Development Services Department
300 N. Coast Hwy.
Oceanside, CA 92057

Dear Mr. Dmohowski:

**NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE
NORTH RIVER FARMS PLANNED DEVELOPMENT PLAN**

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation submitted by the City of Oceanside (City) for the North River Farms Planned Development Plan. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The proposed project constitutes the zoning, use regulations, and development criteria for future development of the property. The 177 acre project site would be divided into four planning areas supporting different housing types.

- The Riverside Village would consist of 45.1 acres of medium density residential uses. This area includes 12.9 acres of agricultural uses, and 4.2 acres of open space/recreational.
- The Village Core would consist of 25 acres of mixed uses including a hotel, maker spaces, retail shops, a farmers market venue, collaborative work spaces, a park, farm facilities, and an education pavilion.
- The North Village would consist of 51.8 acres of single-family and medium density residential uses.
- The Hilltop Village would consist of 41.4 acres of single-family detached homes.

The project site has a land use designation of Agriculture and is zoned Agriculture. The site is also designated as Prime, Statewide, and/or Unique Farmland according to the most recent Important Farmland Map produced by the Department of Conservation's Farmland Mapping and Monitoring Program¹.

¹ Department of Conservation, Farmland Mapping and Monitoring Program, California Important Farmland Finder, 2014, <https://maps.conservation.ca.gov/DLRP/CIFF/>

Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to the State's agricultural land resources. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.² In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and, therefore, mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts. Therefore, all mitigation measures that are potentially feasible should be included in the DEIR. A measure brought to the attention of the Lead Agency should not be left out unless it is infeasible based on its elements.

As such, the Department recommends the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation. Agricultural conservation easements are an available mitigation tool and should always be considered. Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

One source that has proven helpful for regional and statewide agricultural mitigation is the California Council of Land Trusts, which can be found at:

<http://www.calandtrusts.org>

Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the DEIR:

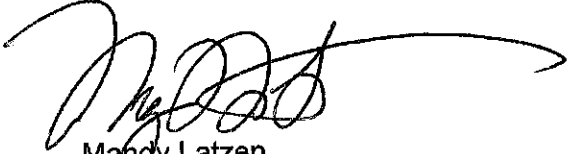
- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.

² California Environmental Quality Act Statute and Guidelines, Association of Environmental Professionals, 2017, Section 21002, page 2.

Mr. Rob Dmohowski
December 21, 2017
Page 3

Thank you for giving us the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the North River Farms Planned Development Plan. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Latzen', with a long horizontal flourish extending to the right.

Mandy Latzen
Deputy Director
Division of Land Resource Protection

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

4050 TAYLOR STREET, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-3193

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

December 20, 2017

11-SD-76

PM 6.21

NOP SCH 2017111069

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

Dear Mr. Dmohowski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) SCH 2017111069 project, which will be located off of North River Road near College Boulevard and State Route 76 (SR-76). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network. Caltrans would like to make the following comments:

Community Planning Comments:

The Oceanside General Plan Circulation Element, updated June 2017, shows a proposal for SR-76, from Interstate 5 (I-5) to Melrose Drive, to be a 6 lane expressway facility (Table 3-6). However, the SANDAG *San Diego Forward* Regional Transportation Plan (RTP) calls for SR-76, from I-5 to Melrose Drive, to be maintained as the existing 4 lane expressway under the Revenue Constrained model. In addition, the Caltrans SR-76 Transportation Concept Report (TCR), dated February 2016, also shows this segment of the route being maintained at a 4 lane expressway facility.

This discrepancy between the State, the region, and the City of Oceanside planning documents should be resolved and remodeled to determine direct and cumulative impacts to the current infrastructure.

Traffic Comments:

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use the *Caltrans Guide for the Preparation of Traffic Impact Studies* as a guideline. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over

Mr. Rob Dmohowski

December 20, 2017

Page 2

100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

The data used in the TIS should not be more than 2 years old. Please also provide the complete set of electronic Synchro version 10 files.

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

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

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

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

Right-of-Way Comments:

Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.

Improvement plans for construction within State Highway R/W must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. Caltrans Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.

Mr. Rob Dmohowski

December 20, 2017

Page 3

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

Sincerely,



for KERI ROBINSON, Acting Chief
Development Review Branch

c: Cara Hilgeson (LLG)



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

December 12, 2017

Mr. Robert Dmohowski
Associate Planner
Development Services Department
City of Oceanside
300 North Coast Highway
Oceanside, California 92054
rdmohowski@ci.oceanside.ca.us

NOTICE OF PREPARATION (NOP) FOR AN ENVIRONMENTAL IMPACT REPORT (EIR) FOR NORTH RIVER FARMS (GPA16-00002, ZA16-00005, T16-00002, 016-00012) PROJECT (SCH# 2017111069)

Dear Mr. Dmohowski:

The Department of Toxic Substances Control (DTSC) has reviewed the subject NOP. The following project description is stated in the NOP: "The North River Farms project is a request for a planned development proposing to construct a maximum of 725 dwelling units with associated agricultural, commercial, and recreational uses on a 177-acre site. The request consists of a General Plan Amendment (GPA) to change the land use from Agricultural (A) to various residential designations, a Zone Amendment from Agriculture (A) and Agriculture -Scenic Park Overlay (A SP) to Planned Development (PD), a Tentative Map, and a Development Plan. The project is described as an agricultural based community with agricultural uses, a farmer's market, a boutique hotel, an Ecology Center, and flexible commercial uses within the village core. The PD Plan designates four separate districts that will support a wide variety of future residential uses including estate homes, single-family detached and cluster developments, and townhouses."

Based on the review of the submitted document, DTSC has the following comments:

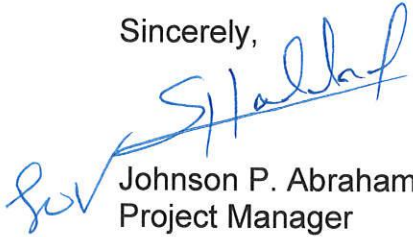
1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
3. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).
4. If the proposed project involves the demolition of existing structures, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations.
5. The NOP states, "The property has a land use designation of Agriculture (A) and is currently zoned Agriculture (A) with a Scenic Park (SP) overlay on the south side of North River road." If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.
6. DTSC recommends evaluation, proper investigation and mitigation, if necessary, of onsite areas with current or historic PCB-containing transformers.
7. If the project development involves soil export/import, proper evaluation is required. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if imported soil was used as backfill onsite and/or backfill soil will be imported, DTSC recommends proper evaluation/sampling as necessary to ensure the backfill material is free of contamination.
8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the PEIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.

Mr. Robert Dmohowski
December 12, 2017
Page 3

If you have any questions regarding this letter, please contact me at (714) 484-5380 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,



Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program – Cypress

kl/sh/ja

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2017111069

From: Robert Dmohowski [<mailto:RDmohowski@ci.oceanside.ca.us>]

Sent: Tuesday, February 13, 2018 4:55 PM

To: Ninia Hammond <nhammond@integralcommunities.com>

Subject: FW: N River Farms project comments

Hi Ninia,

I don't believe I forwarded this to you. Part 2 of Nadine Scotts's response to the NOP.

Robert Dmohowski
Associate Planner
City of Oceanside
Planning Division
Development Services Department
760.435.3563
rdmohowski@ci.oceanside.ca.us

From: Nadine [<mailto:deannie550@sbcglobal.net>]

Sent: Monday, February 05, 2018 2:10 PM

To: Robert Dmohowski <RDmohowski@ci.oceanside.ca.us>; Jonathan Borrego <JBorrego@ci.oceanside.ca.us>; Zack Beck <ZBeck@ci.oceanside.ca.us>

Subject: N River Farms project comments

I was unable to attend either scoping meeting due to illness. Following are my comments at this time. Thank you for considering them.

1. EIRs should deal with parking issues/demand on site as well as using traffic studies for current and expected traffic, up to and including potential and likely evacuations of the nearby area, including Camp Pendleton. Which school districts are impacted and what are their populations? What is the volume of traffic that can be handled in an emergency in and out of the project area along with adjacent homes? Using all available roads, what is the volume of traffic that can be handled. This should not include any outlets at Camp Pendleton as that would likely not be an option without Congressional approval.

2. EIRs should deal comprehensively with public safety-- To that end I submit the Escondido Fire Severity Zones map and request that the EIR address this for the Morro Hills area --particularly in light of the recent Lilac inferno and mandatory evacuations.(See attached Escondido map) I have also have attached the fire map from the incident. Further, the fire station studies done a few years ago should be reviewed and how this affects this highly dense project in an extraordinarily difficult area to properly evacuate and or serve. The Wildland-Urban interface is a critical area to study relative to this property. I was informed that farmland had stopped the westward progression of the Lilac Fire and believe this should be documented and studied. Last "clustering" houses is a known fire risk. Please evaluate. I believe we saw in the Lilac mobile homes losses as well as the devastating number of homes and life lost in the Santa Rosa fire in 2017-8. The various maps in the attached article demonstrate the danger of clustered development.

<http://www.latimes.com/projects/la-me-northern-california-fires-structures/>

3. Even though the fiscal studies are not generally included in EIRs, there must be a reliable check of the applicant's study. This study is on eTrakit, an almost unintelligible system, and should be included on the main N River Farms City Page as should the other studies submitted on eTrakit.

<https://crw.cityoceanside.com/Etrakit3/viewAttachment.aspx?Group=PROJECT&ActivityNo=GPA16-00002&key=RDM%3a1711210136304118>

It appears to be highly flawed in claiming that residential is a plus for the general fund regarding city services. No other study in Oceanside has made this similar determination. It is also questionable that such a rural area can support commercial revenue of the magnitude stated in the applicants' study. The vacancy rate is very underestimated, particularly for a "satellite" development such as this. We must insist on a more reliable, 3rd party independent study.

4. Kindly designate the various flood zones on the project map and explain what is allowed to be built in a floodway and flood zone.

5. Spell out with exactitude where street improvements would be made including bike lanes and sidewalk continuity for the area.

6. Advise if San Diego LAFCO can and will review this projected loss of critical farmland and what countywide/citywide effect this project would have re: LAFCO Adopted Policy L-101. Discuss how this project compatible with L-101. Additionally the City should identify all agricultural land in concert with this Policy. Last ensure this project and the City follow the requirements of LAFCO relative to land use changes of agricultural land including not limited to the impacts of land use conversion that "may adversely affect such lands."

Thank you,

Nadine L Scott
550 Hoover St.
Oceanside CA 92054
760-803-6813

--

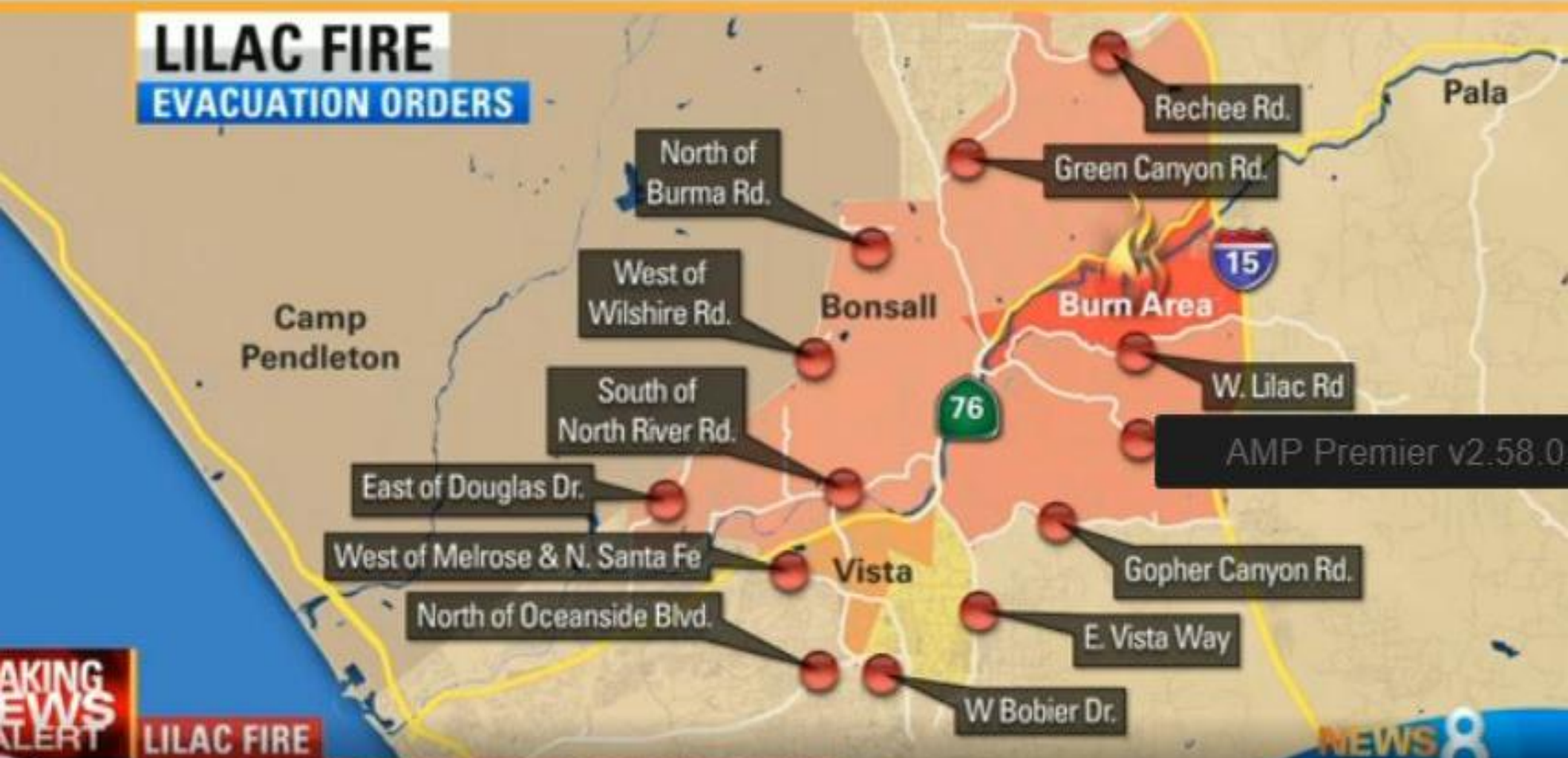
Make Our World Kind



Virus-free. www.avast.com

LILAC FIRE

EVACUATION ORDERS



AMP Premier v2.58.0

MAKING NEWS ALERT

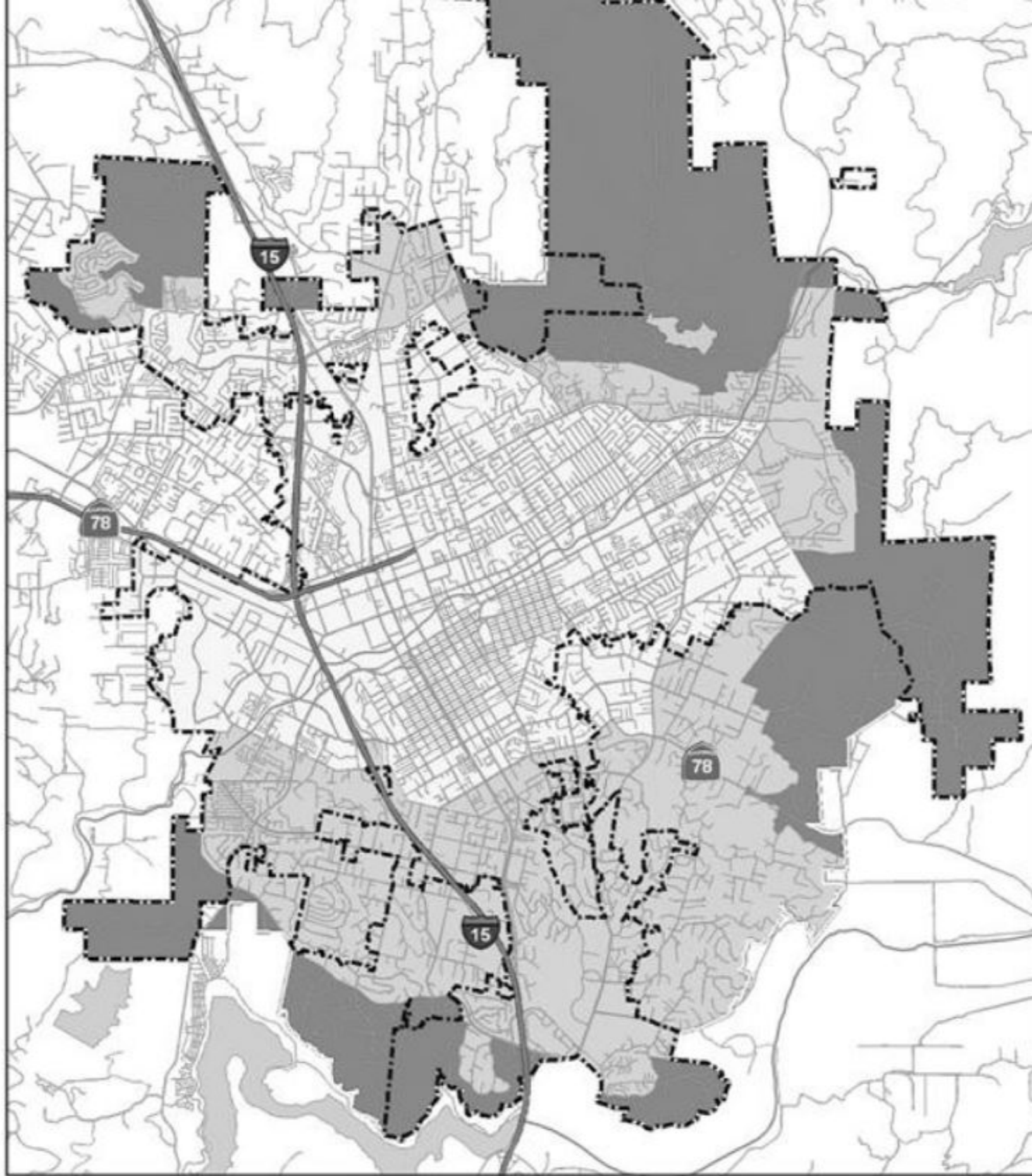
LILAC FIRE

4,100 ACRES BURNED, 0% CONTAINMENT

EVACUATE YOUR HOMES. TOMORROW FIRE RESOURCES FROM CAMP PENDLETON WILL BE AVAILABLE

NEWS 8

LIVE 9:46 69°



Fire Severity Zones

Severity Zones	Roads
VERY HIGH	Fire service area
HIGH	City boundary
MODERATE	

N

0 1500 3000 4500
Feet

November, 200



From: Terry McCann [mailto:writing72000@yahoo.com]
Sent: Thursday, December 28, 2017 12:23 PM
To: Ninia Hammond <ninia@livenorthriverfarms.com>
Subject: Re: North River Farms Neighbor Meeting

Comments from Terry & Derek McCann, 1117 Breakaway Drive, Arrowood, Oceanside, CA 92057.

Our main concern is safety. When the residents of the above area (under Mandatory Evacuation orders) left their homes it took two hours to drive from the Arrowood Development to the 76. The fire at that stage was two and a half miles from our homes. If the fires had not been contained those residents would have burned in their cars.

I was also told that the Evacuation Route for people living in the Sleeping Indian Trail area is a two lane highway? This is just not acceptable. Nobody can evacuate safely on such a small road as this even now.

Therefore, I object strenuously to building any more homes in the agricultural areas in question. More people on the roads stated mean major loss of life.

(Example: We lived in Houston, Texas for 26 years. We saw the devastation caused by the Hurricanes there. The worst one we experienced - one which was totally unavoidable and led to loss of life - was when the citizens were told to evacuate using the FOUR lanes on the I59. Now this you might think was acceptable, except there was major gridlock. Thousands of people stuck on the highway for hours ran out of gas and water; the heat was unbearable; helicopters had to lift flight people to hospitals many of whom died in the process. Sadly, if people had just stayed in their homes they would have been safe?

Lessons were learned in Houston, Texas: Now the Evacuation Route has changed. They now use BOTH sides of the Highway (EIGHT LANES) which makes sense, as nobody is going to drive INTO the danger zone)!

I would like to speak to the three Councilors who voted to build these thousand homes? In fact I would like everyone in and around these areas to call them with their objections. I especially want EVERYONE to know who they are? It's 'We the People' not 'They the People' in this great country of ours. They work for US, not the other way around.

This housing scheme is about Money, NOT about People?
Terry & Derek McCann.

From: Ninia Hammond <ninia@livenorthriverfarms.com>
To: ninia@livenorthriverfarms.com
Cc: Arianne Brandt <arianne@organikseo.com>
Sent: Tuesday, December 26, 2017 10:46 AM
Subject: North River Farms Neighbor Meeting

Thank you for sharing your email address and for your interest in North River Farms.

In an effort to address your questions and concerns, we have scheduled monthly neighborhood meetings, which will be held the second Tuesday of each month at Melba Bishop Recreation Center, 5306 N River Road, from 5:30 to 7:30 PM. The first meeting will be held Tuesday, January 9th at 5:30 PM.

We intend for the meeting format to be informal and conversational. Attendees will be able to view imagery presented at the December meetings, and representatives of the Applicant and Consultant team will be available to answer questions.

Please note that the comment (scoping) period for the Environmental Impact Report (EIR) is still open, so you are also able to provide comments at this meeting and/or you may also simply reply to this email.

We look forward to connecting in the new year, and we'll plan to send a reminder email in advance of January 9th.

Merry Christmas and Happy New Year,
Ninia Hammond
www.livenorthriverfarms.com





State of California • Natural Resources Agency
Department of Conservation
Division of Land Resource Protection
801 K Street • MS 14-15
Sacramento, CA 95814
(916) 324-0850 • FAX (916) 327-3430

Edmund G. Brown Jr., Governor
Kathryn M. Lyddan, Division Director

December 21, 2017

VIA EMAIL: RDMOHOWSKI@CI.OCEANSIDE.CA.US

Mr. Rob Dmohowski, Associate Planner
City of Oceanside, Development Services Department
300 N. Coast Hwy.
Oceanside, CA 92057

Dear Mr. Dmohowski:

**NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE
NORTH RIVER FARMS PLANNED DEVELOPMENT PLAN**

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation submitted by the City of Oceanside (City) for the North River Farms Planned Development Plan. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The proposed project constitutes the zoning, use regulations, and development criteria for future development of the property. The 177 acre project site would be divided into four planning areas supporting different housing types.

- The Riverside Village would consist of 45.1 acres of medium density residential uses. This area includes 12.9 acres of agricultural uses, and 4.2 acres of open space/recreational.
- The Village Core would consist of 25 acres of mixed uses including a hotel, maker spaces, retail shops, a farmers market venue, collaborative work spaces, a park, farm facilities, and an education pavilion.
- The North Village would consist of 51.8 acres of single-family and medium density residential uses.
- The Hilltop Village would consist of 41.4 acres of single-family detached homes.

The project site has a land use designation of Agriculture and is zoned Agriculture. The site is also designated as Prime, Statewide, and/or Unique Farmland according to the most recent Important Farmland Map produced by the Department of Conservation's Farmland Mapping and Monitoring Program¹.

¹ Department of Conservation, Farmland Mapping and Monitoring Program, California Important Farmland Finder, 2014, <https://maps.conservation.ca.gov/DLRP/CIFF/>

Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to the State's agricultural land resources. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.² In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and, therefore, mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts. Therefore, all mitigation measures that are potentially feasible should be included in the DEIR. A measure brought to the attention of the Lead Agency should not be left out unless it is infeasible based on its elements.

As such, the Department recommends the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation. Agricultural conservation easements are an available mitigation tool and should always be considered. Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

One source that has proven helpful for regional and statewide agricultural mitigation is the California Council of Land Trusts, which can be found at:

<http://www.calandtrusts.org>

Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the DEIR:

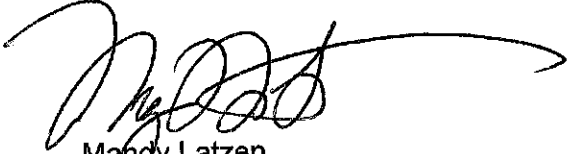
- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measure for all impacted agricultural lands within the proposed project area.

² California Environmental Quality Act Statute and Guidelines, Association of Environmental Professionals, 2017, Section 21002, page 2.

Mr. Rob Dmohowski
December 21, 2017
Page 3

Thank you for giving us the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the North River Farms Planned Development Plan. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Latzen', with a long horizontal flourish extending to the right.

Mandy Latzen
Deputy Director
Division of Land Resource Protection



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

December 12, 2017

Mr. Robert Dmohowski
Associate Planner
Development Services Department
City of Oceanside
300 North Coast Highway
Oceanside, California 92054
rdmohowski@ci.oceanside.ca.us

NOTICE OF PREPARATION (NOP) FOR AN ENVIRONMENTAL IMPACT REPORT (EIR) FOR NORTH RIVER FARMS (GPA16-00002, ZA16-00005, T16-00002, 016-00012) PROJECT (SCH# 2017111069)

Dear Mr. Dmohowski:

The Department of Toxic Substances Control (DTSC) has reviewed the subject NOP. The following project description is stated in the NOP: "The North River Farms project is a request for a planned development proposing to construct a maximum of 725 dwelling units with associated agricultural, commercial, and recreational uses on a 177-acre site. The request consists of a General Plan Amendment (GPA) to change the land use from Agricultural (A) to various residential designations, a Zone Amendment from Agriculture (A) and Agriculture -Scenic Park Overlay (A SP) to Planned Development (PD), a Tentative Map, and a Development Plan. The project is described as an agricultural based community with agricultural uses, a farmer's market, a boutique hotel, an Ecology Center, and flexible commercial uses within the village core. The PD Plan designates four separate districts that will support a wide variety of future residential uses including estate homes, single-family detached and cluster developments, and townhouses."

Based on the review of the submitted document, DTSC has the following comments:

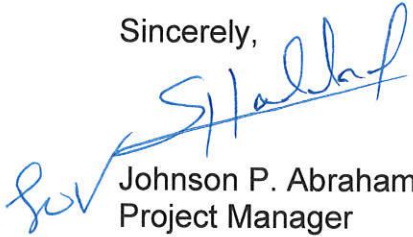
1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
3. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).
4. If the proposed project involves the demolition of existing structures, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations.
5. The NOP states, "The property has a land use designation of Agriculture (A) and is currently zoned Agriculture (A) with a Scenic Park (SP) overlay on the south side of North River road." If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.
6. DTSC recommends evaluation, proper investigation and mitigation, if necessary, of onsite areas with current or historic PCB-containing transformers.
7. If the project development involves soil export/import, proper evaluation is required. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if imported soil was used as backfill onsite and/or backfill soil will be imported, DTSC recommends proper evaluation/sampling as necessary to ensure the backfill material is free of contamination.
8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the PEIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.

Mr. Robert Dmohowski
December 12, 2017
Page 3

If you have any questions regarding this letter, please contact me at (714) 484-5380 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,



Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program – Cypress

kl/sh/ja

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2017111069



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



January 22, 2018

Rob Dmohowski, Associate Planner
City of Oceanside
Development Services Department
300 N. Coast Hwy.
Oceanside, California 92057

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the North River Farms Planned Development Plan Project SCH# 2017111069

Dear Mr. Dmohowski:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) for the North River Farms Planned Development Plan Project Draft Environmental Impact Report (DEIR).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

CDFW also administers the Natural Community Conservation Planning (NCCP) program. The City of Oceanside (City) prepared a draft Oceanside Subarea Plan (SAP) under the Multiple Habitat Conservation Program Subregional Plan, which also included draft subarea plans for the cities of Carlsbad, Vista, San Marcos, Escondido, and Encinitas. Although the City has used its

allotted 5 percent take of coastal sage scrub vegetation, it has not completed or adopted a final subarea plan. To date, only the City of Carlsbad has approved their Subarea Plan and received state and federal take permits.

Project Location:

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

Project Description/Objective:

The proposed Project would constitute the zoning, use regulations, and development criteria for future development of the property. The proposed residential uses under the PD Plan would incorporate a range of architectural styles prevalent in South Morro Hills' residential architecture. The 177-acre Project area would be divided into four Planning Areas supporting different housing types and farm plots. The Riverside Village would consist of 45.1 acres of medium density residential uses. Residential densities in the Riverside Village would range from 6.0 to 15.0 dwelling units to the acre. The Village Core would consist of 25.0 acres of mixed uses including a hotel, maker spaces, retail shops, a farmers' market venue, collaborative work spaces, a park, farm facilities, and an education pavilion. Residential densities in the core would range from 15.1 to 20.0 dwelling units to the acre. The North Village would consist of 51.8 acres of single-family and medium density residential uses. Residential densities in the North Village would range from 3.6 to 9.9 dwelling units to the acre. The Hilltop Village would consist of 41.4 acres of single-family detached homes. The base density would range from 3.6 dwelling units per acre to a maximum density of 5.9 dwelling units per acre.

COMMENTS AND RECOMMENDATIONS

Specific Comment

The project site lies within an area north of the San Luis Rey River identified as the Agricultural Exclusion Zone (AEZ) in the City's draft NCCP SAP. Continuation of agricultural practices in the AEZ were considered generally compatible with the biological values of natural habitat and the riparian areas being conserved in the bordering San Luis Rey River. Under the draft SAP, discretionary actions or conversions to non-agricultural practices would invoke additional conservation standards, particularly requirements to preserve, restore, and/or enhance natural vegetation to form a 50- to 100-foot buffer distance to existing wetland vegetation communities. CDFW strongly recommends that a minimum 100-foot buffer be created between any forthcoming development and the very high quality habitat within the San Luis Rey River. Regardless of the status of the City's SAP, CDFW believes a 100-foot buffer of restored habitat is appropriate based upon the highly sensitive species known to occur along the adjacent San Luis Rey River, particularly the state and federal listed endangered least Bell's vireo (*Vireo bellii pusillus*), potentially occurring state and federal listed southwestern willow flycatcher

(*Empidonax extimus trillii*), and other sensitive species including the yellow-breasted chat (*Icteria virens*) and yellow warbler (*Dendroica petechia*). To be consistent with the draft SAP, the DEIR should also address potential impacts to wildlife movement linkages along the river, or between upland areas and the river.

Additionally, we recommend that the City adopt a Habitat Development Fee as provided for in Section 5 of the draft SAP. This would be an in-lieu fee to offset direct impacts to agricultural and vacant lands (i.e., Habitat Group F in the draft SAP) and serve as a critical source of revenue to restore or enhance lands in priority areas in the SAP's Wildlife Corridor Planning Zone.

General Comments

CDFW offers the following general comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

1. CDFW has responsibility for wetland and riparian habitats. It is the policy of CDFW to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, Project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.
 - a) The Project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by CDFW.¹ Please note that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.
 - b) The CDFW also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the Project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.²

2. CDFW considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
3. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR.
 - a) The document should contain a complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas.
 - b) A range of feasible alternatives should be included to ensure that alternatives to the proposed Project are fully considered and evaluated; the alternatives should avoid or

² A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

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, undertaken at the appropriate time of year. The DEIR should include the following information.
 - a) CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b) A thorough, recent floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). CDFW recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 20083). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
 - c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. CDFW's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service.

3 Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
 - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the Project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the Project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
 - b) Discussions regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
 - c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
 - d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from Project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance.
7. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts.

The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations. Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
10. CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.
12. The Polyphagous and Kuroshio Shot Hole Borers are invasive ambrosia beetles that introduce fungi and other pathogens into host trees. The adult female (1.8-2.5 mm long) tunnels galleries into the cambium of a wide variety of host trees, where it lays its eggs and propagates the *Fusarium* fungi species for the express purpose of feeding its young. These fungi cause *Fusarium* dieback disease, which interrupts the transport of water and nutrients in at least 58 reproductive host tree species, with impacts to other host tree species as well. With documented occurrences in nearby reaches of the San Luis Rey River, the spread of invasive shot hole borers (ISHBs) could have significant impacts in local ecosystems. Therefore, with regard to ISHBs, we recommend the DEIR include the following:

- a) a thorough discussion of the direct, indirect, and cumulative impacts that could occur from the potential spread of ISHBs as a result of proposed activities in the DEIR;
- b) an analysis of the likelihood of the spread of ISHBs as a result of the invasive species' proximity to above referenced activities;
- c) figures that depict potentially sensitive or susceptible vegetation communities within the Project area, the known occurrences of ISHB within the Project area (if any), and ISHB's proximity to above referenced activities; and
- d) a mitigation measure or measure(s) within the final DEIR that describe Best Management Practices (BMPs) that bring impacts of the Project on the spread of ISHB below a level of significance. Examples of such BMPs include:
 - i) education of on-site workers regarding ISHB and its spread;
 - ii) reporting sign of ISHB infestation, including sugary exudate ("weeping") on trunks or branches and ISHB entry/exit-holes (about the size of the tip of a ballpoint pen), to the Department and UCR's Eskalen Lab;
 - iii) equipment disinfection;
 - iv) pruning infected limbs in infested areas where Project activities may occur;
 - v) avoidance and minimization of transport of potential host tree materials;
 - vi) chipping potential host materials to less than 1 inch and solarization, prior to delivering to a landfill;
 - vii) chipping potential host materials to less than 1 inch, and solarization, prior to composting on-site;
 - viii) solarization of cut logs; and/or
 - ix) burning of potential host tree materials.

Please refer to UCR's Eskalen lab website for more information regarding ISHBs:
<http://eskalenlab.ucr.edu/pshb.html>.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Eric Hollenbeck, Senior Environmental Scientist at (858) 467-2720 or Eric.Hollenbeck@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento
Janet Stuckrath, USFWS

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

4050 TAYLOR STREET, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-3193

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

December 20, 2017

11-SD-76

PM 6.21

NOP SCH 2017111069

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

Dear Mr. Dmohowski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) SCH 2017111069 project, which will be located off of North River Road near College Boulevard and State Route 76 (SR-76). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network. Caltrans would like to make the following comments:

Community Planning Comments:

The Oceanside General Plan Circulation Element, updated June 2017, shows a proposal for SR-76, from Interstate 5 (I-5) to Melrose Drive, to be a 6 lane expressway facility (Table 3-6). However, the SANDAG *San Diego Forward* Regional Transportation Plan (RTP) calls for SR-76, from I-5 to Melrose Drive, to be maintained as the existing 4 lane expressway under the Revenue Constrained model. In addition, the Caltrans SR-76 Transportation Concept Report (TCR), dated February 2016, also shows this segment of the route being maintained at a 4 lane expressway facility.

This discrepancy between the State, the region, and the City of Oceanside planning documents should be resolved and remodeled to determine direct and cumulative impacts to the current infrastructure.

Traffic Comments:

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use the *Caltrans Guide for the Preparation of Traffic Impact Studies* as a guideline. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over

Mr. Rob Dmohowski

December 20, 2017

Page 2

100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

The data used in the TIS should not be more than 2 years old. Please also provide the complete set of electronic Synchro version 10 files.

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

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

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

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

Right-of-Way Comments:

Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.

Improvement plans for construction within State Highway R/W must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. Caltrans Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.

Mr. Rob Dmohowski

December 20, 2017

Page 3

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

Sincerely,



for KERI ROBINSON, Acting Chief
Development Review Branch

c: Cara Hilgeson (LLG)

810 Mission Avenue
Oceanside, CA 92054

(760) 966-6500
(760) 967-2001 (fax)
www.GoNCTD.com

January 18, 2018

Mr. Rob Dmohowski, Associate Planner
Development Services Department
City of Oceanside
300 North Coast Highway
Oceanside, CA. 92057

Re: North River Farms Planned Development, Oceanside

Dear Mr. Dmohowski:

Thank you for the opportunity to review and comment on the North River Farms Planned Development, located in the South Morro Hills area in Oceanside.

Upon review of the site plans received by the North County Transit District (NCTD) on January 8, 2018, NCTD has the following recommendation:

Construct two ADA boarding and alighting areas (concrete bus stop pads) at each of the three proposed roundabouts along North River Road. Each bus stop should be located far-side (just past the roundabouts) in both the east and west directions, including space for a 40 foot bus to clear each intersection and crosswalk.

NCTD does not currently operate transit in the Morro Hills area, but future growth may result in expanded service. Bus stop infrastructure would prepare NCTD for any potential service expansion.

Thank you again for allowing NCTD to review and comment on this project. Should you have any questions related to this review, feel free to contact me at (760) 966-6708, or via email at dblythe@nctd.org.

Sincerely,



Damon Blythe
Chief Operations Officer – Transit Planning & Bus Operations

BOARD OF DIRECTORS

Rebecca Jones

Vice Mayor, City of San Marcos
Board Chair

John J. Aguilera

Deputy Mayor, City of Vista
Board Vice-Chair

Mark Packard

Councilmember, City of Carlsbad

Dave Druker

Deputy Mayor, City of Del Mar

Tony Kranz

Councilmember, City of Encinitas

Ed Gallo

Councilmember, City of Escondido

Jack Feller

Councilmember, City of Oceanside

Bill Horn

Supervisor, County of San Diego

Jewel Edson

Councilmember, City of Solana Beach

EXECUTIVE DIRECTOR

Matthew O. Tucker

GENERAL COUNSEL

Lon A. Winfree



San Diego County Archaeological Society, Inc.

Environmental Review Committee

16 December 2017

To: Mr. Rob Dmohowski, Associate Planner
Development Services Department
City of Oceanside
300 North Coast Boulevard
Oceanside, California 92054

Subject: Notice of Preparation of a Draft Environmental Impact Report
North River Farms Planned Development Plan

Dear Mr. Dmohowski:

Thank you for the Notice of Preparation for the subject project, which was received by this Society last month.

We are pleased that cultural resources have been included in the list of subject areas to be addressed in the DEIR. In order to permit us to review the cultural resources aspects of the project, please include us in the distribution of the DEIR when it becomes available for public review. Also, in order to facilitate our review, we would appreciate being provided with one copy of the cultural resources technical report(s) along with the DEIR.

SDCAS appreciates being included in the environmental review process for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Royle, Jr.", is written over the typed name.

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

cc: SDCAS President
File

Jan, 10, 2018

Robert Dmohowski, Associate Planner
Planning Department, City Of Oceanside
300 N. Coast Highways, Oceanside

re: North River Farms

Dear Rob;

The following are my questions to be considered for the EIR studies:

1. How is the developer going to mitigate the loss of 177 acres of prime farmland, land that has been farmed consistently for 30 plus years producing primarily food crops? Will this mitigation be required within the city of Oceanside or would they be allowed to mitigate outside the city limits?
2. The City of Oceanside has been trying to find ways to mitigate the waste stream sent to landfills within the city limits, recently Green Oceanside has determined that applying the organic waste (both green waste and unused food) to farms in Oceanside would help Oceanside close the waste loop, which would also reduce our gas emissions, and provide more fertile soils for healthy food production. How will the loss of this farmland be mitigated for this very important direction?
3. Rich Agricultural soils hold more water and is important in the recharging of our groundwater reducing storm water runoff and moderating fire risk, how will the loss of this land be mitigated with these three concerns?
4. NRF has proposed an organic farm, placing an organic farm in close proximity to existing commercial farms will increase the risk of damaging pests and potential damaging food quarantines to existing commercial farm food production, what types of buffers between NRF organic farms and existing SMH farms will be required?
5. Currently farming regulations require sufficient buffers and notifications between residential development and farming operations, both organic and non-organic. These are required for dust control, sound, farming activity, pesticide and herbicides applications both organic and non-organic. What are NRF's plan for buffers and its plan to notify NRF residential development as well as surrounding existing residential development?
6. Agriculture has a vital role in our regional efforts to slow down climate change. Climate action plans, such as Oceanside's, recognize the value of trees and crops in removing green house gases like carbon dioxide from the atmosphere, pulling carbon dioxide out of the atmosphere and locking it away in the soil, roots

and wood. How is NRF mitigating the loss of this productive farmland and the precedent this may set in reducing existing farmland on surrounding farms?

7. NRF has strong evidence of Native American habitations. Several metates have been found within the rock outcroppings on the north side of North River Road. These tools were used in food production to grind corn, acorns and other items for cooking preparation. This is evidence of a communal area where women would come together to work and socialize which would also suggest the presence of a village nearby or within the NRF proposed development. What studies have been done to research this and what is being done to preserve this area?

8. South Morro Hills Agitourism committee is in process of developing its Community Vision Plan which is to provide a balanced development that benefits the community by, preserving viable commercial farming, increasing Agritourism opportunities and increasing land values within the 3600 acres of this area which 2200 are commercial farm and nursery land of which NRF proposed development would set a precedent on. How is NRF going to address these issues and how does their proposed development of 720 residential units taking 70% of the current allowed housing in South Morro Hills, potentially all the capacity within the sewer treatment facility at San Luis Rey and capacities for public services?

9. Traffic impacts will be highly significant on all circulation routes surrounding this development, the College Bridge, intersections and circulation routes. Has the developer provided studies on Sleeping Indian Road, which is a major thoroughfare for the community as well as an evacuation route for Fallbrook. During peak times getting onto North River Road from Sleeping Indian going both east and west is a current problem, adding 720 houses will push this intersection into failure. This intersection needs to be added to the traffic and evacuation study.

There are so many more concerns that NRF will impose on the existing neighborhoods agricultural character, as well as impacts to traffic, and evacuation routes to the entire area. I feel very strongly that if given more direction NRF proposed project could fit into South Morro Hills but at a reduction in the amount of homes and infrastructure being proposed.

Sincerely;

Louise Balma

Architect
745 Sleeping Indian Road, Oceanside

Robert Dmohowski

From: Chris Button <cbutton2@socal.rr.com>
Sent: Thursday, January 11, 2018 12:53 PM
To: Robert Dmohowski
Subject: North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Mr. Dmohowski, I live in Huntington Beach and cannot make the scoping meeting.

Please ensure on my behalf that any EIR include the effects on Sleeping Indian Road, a posted 'bicycle friendly' route (if this project is approved you should consider taking down these signs).

All of the roads surrounding this project are terribly inadequate already and cannot handle a development of this size/density regardless of any improvements made.

I have property very near this development on Sleeping Indian Road and am only allowed to build two units on 4.21 acres, this density is more in tune with the area and the infrastructure will handle it with proper improvements.

This is the first I've heard of this project, my property is so close I wonder why?

Thank you for your time, cb.

Chris button
APN 121 201 04
9242 Christine Drive
Huntington Beach, ca 92646
714 330-5584

11 January, 2018

Dear Mr. Dmohowski:

This is regarding the EIR Public Scoping Meeting for the proposed North River Farms Planned Development held 13 December 2017 at the Melba Bishop Recreation Center, 5306 N. River Road, Oceanside, which you helped moderate.

The meeting attendees were highly energized, and the meeting could easily have become chaotic. Thank you and thanks to your colleagues for your efforts aimed at making sure the meeting progressed in an orderly fashion. This helped provide attendees a chance to express their concerns.

I would like to submit my serious concerns about the proposed project, which are outlined in the attached letter. Please direct this to all appropriate officials in the City of Oceanside. Or alternately, provide me a list of appropriate contacts so I can circulate it directly.

Thank you,

A handwritten signature in blue ink, appearing to read "P. Johnston", with a long horizontal flourish extending to the right.

Phil Johnston
1544 Sleeping Indian Road
Fallbrook CA 92028

11 January, 2018

Concerns Regarding Proposed North River Road Development

Integral Communities Corporation is preparing to undertake a high-density housing development on North River Road, which they refer to as "The North River Farms Planned Development".

The project is located on the floodplain of one of the major rivers providing drainage to the interior of San Diego County. Usually, the San Luis Rey river is a small creek or even a dry riverbed. However, during intense rainfall events, rivers such as this will fill their channels beyond capacity and will overflow their river banks, sending large volumes of fast-moving water across adjacent areas, potentially carrying debris such as trees, boulders, and vehicles. When this happens, structures in the path of this water flow will be destroyed, and people who are in the path will be killed.

The City of Oceanside keeps on file, and posts online, Flood Insurance Rate Maps (FIRMS). The pertinent maps for this proposed project area are Panels 468 & 469. These maps show that the majority of the proposed project area lying south of North River Road is within the outline of a 100-year flood. Furthermore, parts of the "Village Core", parts of the "Medium Density Housing" and parts of the "Single Family Residential" areas of the proposed project are all within the mapped "Floodway Area" that is clearly annotated "Must be kept clear of encroachment... (to prevent) substantial increases in flood heights".

I believe the situation is actually considerably more dangerous than these maps indicate. These maps are regional in nature, and are most likely prepared using methodologies appropriate for the Gulf Coast of the USA and other flat-lying areas. These maps do not address local effects such as possible rapid erosion of river banks due to high velocity water flow, as happens in California where stream gradients are steeper. In my opinion, an Environmental Impact Report (EIR) would almost certainly identify safety risks above and beyond the very serious dangers already indicated by the FIRM maps.

I believe it is imperative that local hydrology conditions such as the potential for debris-laden high velocity flowing water, and possible river bank erosion, be addressed in an Environmental Impact Report (EIR).

The fact that seven miles of continuous large levees have been constructed from College Blvd clear to the Pacific Ocean is clear evidence that the City of Oceanside is fully aware of the potential for severe flooding of the San Luis Rey River beyond its existing channel.

Recent Historic flooding is further very obvious evidence of the flooding risk in this area. During the 1980's El Niño, there was severe flooding that washed out North River Road near the Melba Bishop community center. Traffic was diverted for months until repairs were completed. As I

understand it, this damage provided the impetus for the levee flood control project. The project started at College to protect downstream homes, and did not include lands east of College due to agricultural use.

It seems clear to me the floodway area should not even be zoned 2.5 acres per residence. The proper housing density within a dangerous flood zone is zero residences per acre. Certainly not 20, or 10 or 5, or any other number of residences per acre except zero.

In Summary:

- City of Oceanside maps show a floodway area which is clearly identified as being within the 100-year flood zone, and which is clearly annotated "must be kept clear of encroachment... (to prevent) substantial increases in flood heights". Without any doubt, this is a serious safety issue. And the FIRM map's land use directive to *not* encroach is clear and unambiguous.
- Despite this, a high-density housing project which *does significantly encroach into this very same area* is being proposed (Integral's North River Farms Planned Development).
- Given the readily available flood risk map information, it is astonishing to me that a development in this location is even being considered.
- This proposed project is being advanced through the approval process by City of Oceanside officials and personnel.
- The City of Oceanside should conscientiously protect the safety of its citizens. In this case, I believe that standard is not being met.
- Due to the historic flooding in this area and the known flooding risks which are clearly identified on City of Oceanside maps, I suspect that the City of Oceanside would be exposed to very significant liabilities in the event of loss of property or loss of life during a flood.
- I believe this project should be rejected, decisively and without further delay. I also believe the project promoter should be formally rebuked for attempting to advance a project in a floodway area clearly annotated on City Maps as "must be kept clear of encroachment".

This is certainly an issue which should be considered in the EIR. But more generally: This is a public safety issue; this is a project which easily could expose the City of Oceanside to very significant future flood control expenses; and this project could easily expose the City of Oceanside to liability issues.

I think these issues go above and beyond the scope of the EIR, and need to be addressed accordingly. Please let me know what is the proper venue for bringing these concerns to the attention of the city planners.

Possibly there is something I don't understand about how the project has progressed up to this point. Or possibly there are other factors regarding the flood risks that I'm not aware of or have misunderstood. If so, please let me know.

I will be looking forward to your response regarding this matter.

Best Regards,



Phil Johnston
1544 Sleeping Indian Road
Fallbrook CA 92028

Links:

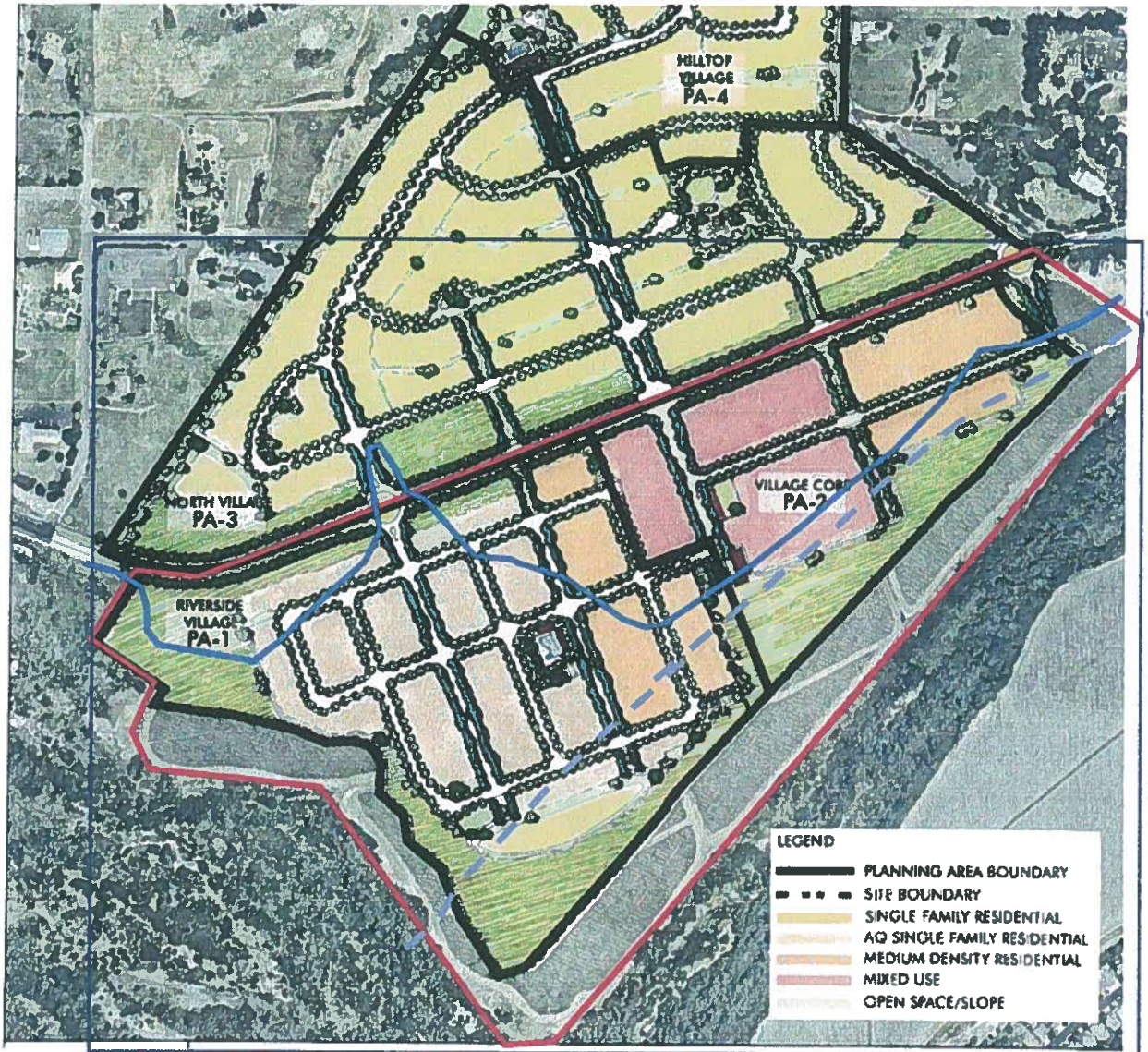
https://en.wikipedia.org/wiki/San_Luis_Rey_River

<http://www.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?BlobID=46086>

<https://www.ci.oceanside.ca.us/gov/dev/eng/flood/insurance.asp>

<https://www.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?blobid=26456>

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



Integral Development Proposed Project Map

The light blue line shows the position of the 100 year flood boundary, as indicated on the FIRM maps.

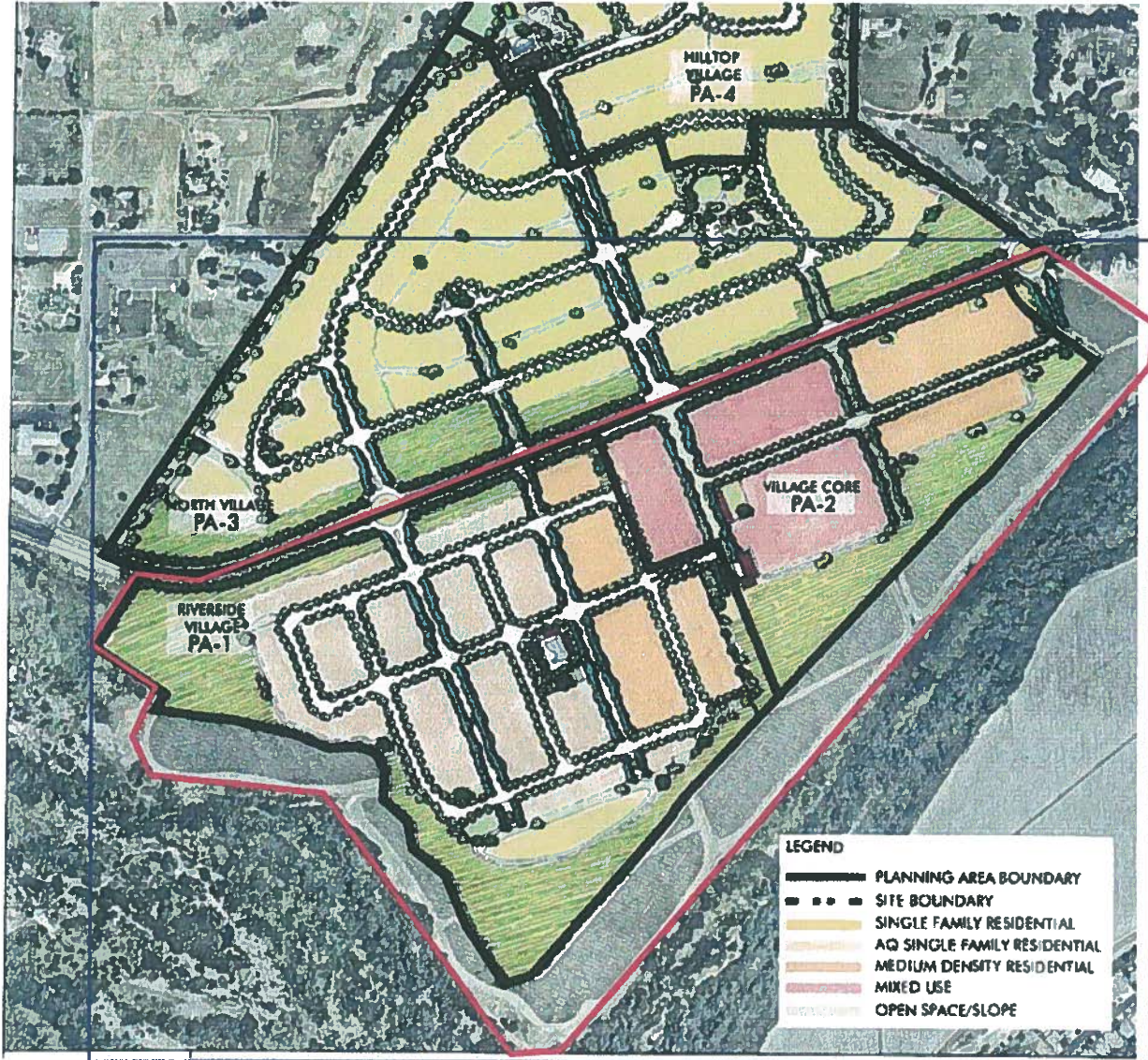
The dashed blue-gray line shows the position of the floodway area clearly annotated on City Maps as “must be kept clear of encroachment”.



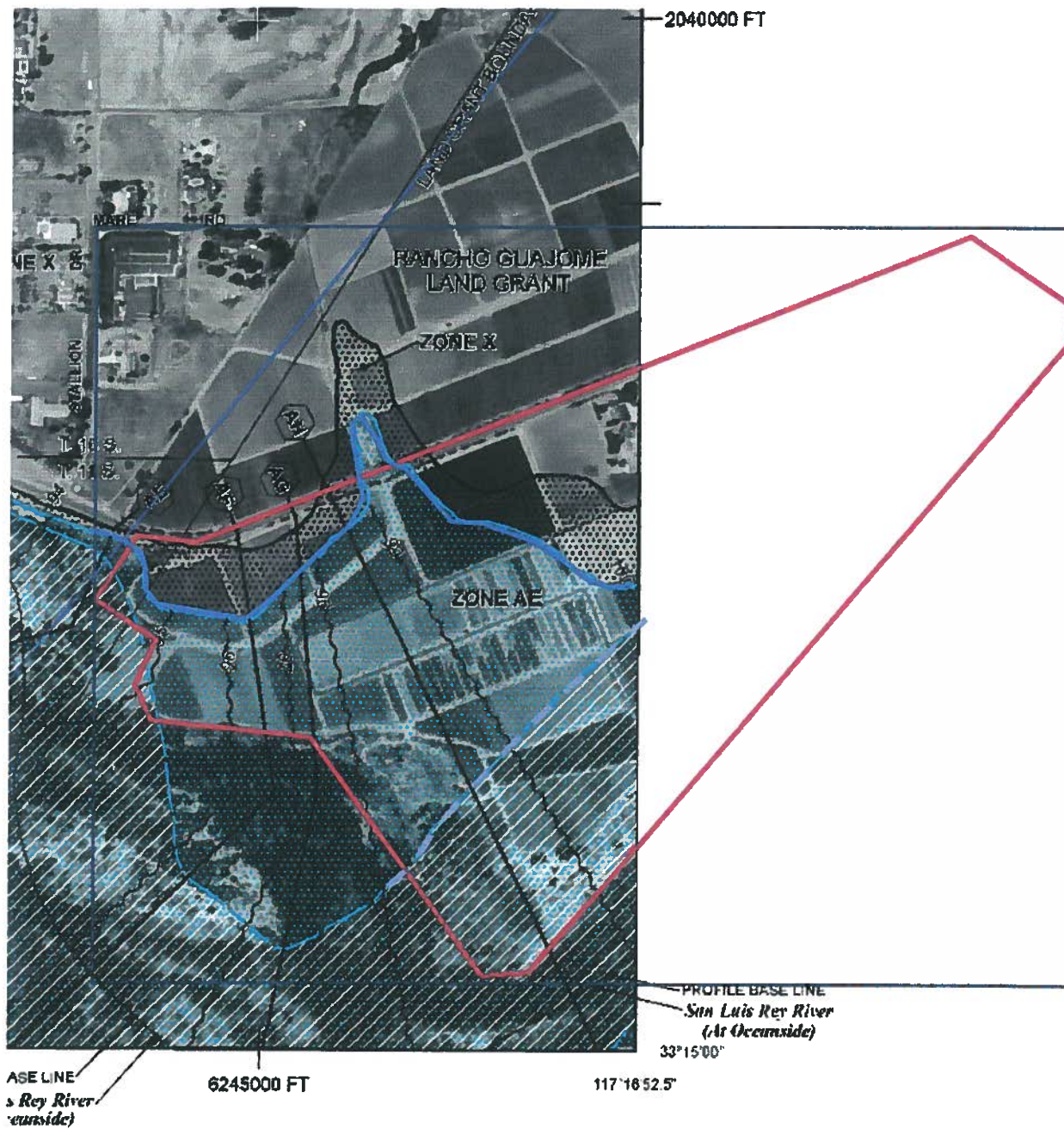
Google Earth Photograph of area in question

The red and blue polygons have been added as a reference, to help with displaying the several map images which follow at common positions and scales.

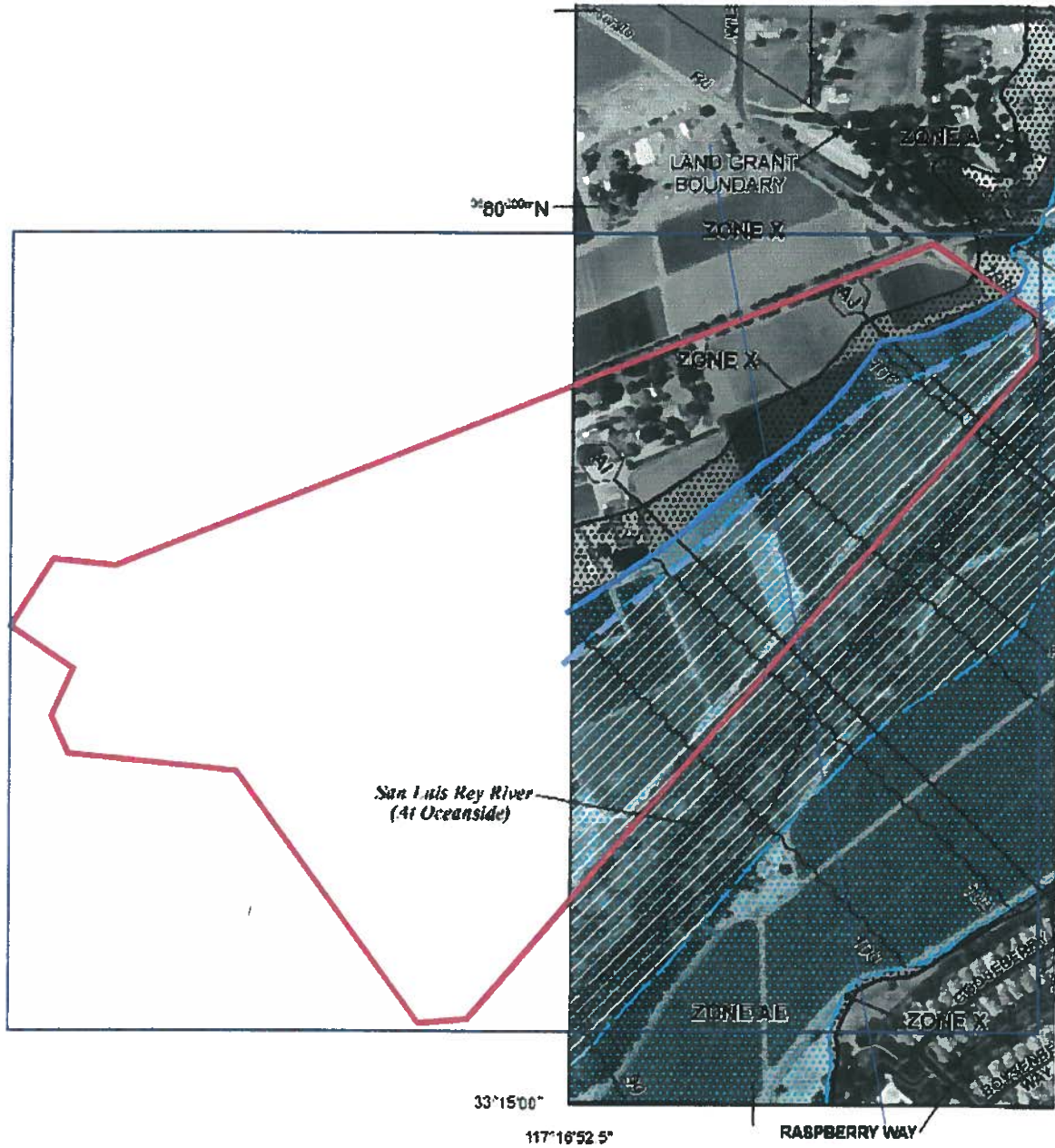
The polygons also aid in quickly identifying features which are common to all maps.



Integral Development Proposed Project Map

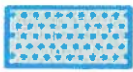


Flood Insurance Rate Map (FIRM) - Panel 468



Flood Insurance Rate Map (FIRM) - Panel 469

LEGEND



SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Areas to be protected from 1% annual chance flood event by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.



FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

Legend from FIRM maps shown above

From: **Nadine** deannie550@sbcglobal.net 
Subject: N River Farms Meeting
Date: January 16, 2018 at 2:40 PM
To: **Martinek, Dennis** dmartinek@palomar.edu, **Diane Nygaard** dnygaard3@gmail.com, **Victor Roy** victoryawaitsyou2@hotmail.com,
Erin Morin erinmorin1@gmail.com



Are you any of you going to the N River Farms NOP meeting tonight? I am not sure I'll make it.

I would like one or several of you to give them the attachment and ASK for a Fire Risk Map or Fire Severity Map/zones as they have done in Escondido. This shows the areas for the ag-urban or wildland/urban. I think this is going to be a crucial document as it implies type of construction, location of construction, fire response/ability to respond, evacuation issues, etc.

Probably should cover terrain/elevations as well as the geography precludes "cut-thrus" through properties due to the hilly nature of the area.

Any map produced should also show streets and evacuation routes/carrying numbers, ie. how many vehicles can use the routes in a reasonable amount of time. 2 hours is NOT reasonable to evacuate in the event of wildland fires. Sheltering in place is a suicide mission as well! Tile roofs, wood construction, etc.etc.

It should also show wind direction and speeds-- both without fire and with the recent Lilac Fire. That data is going to be available.

Should also show fire water availability and HOW crews get to this site in the event of an evacuation.

Also I am not sure. but has Camp Pen weighed in on this? How

will they
get people in and out of the Back Gate in event of fire?
City should be
consulting with military on this. Please ask them to.

Kindly let me know if you can present the attachment and
make the
requests as outlined above.

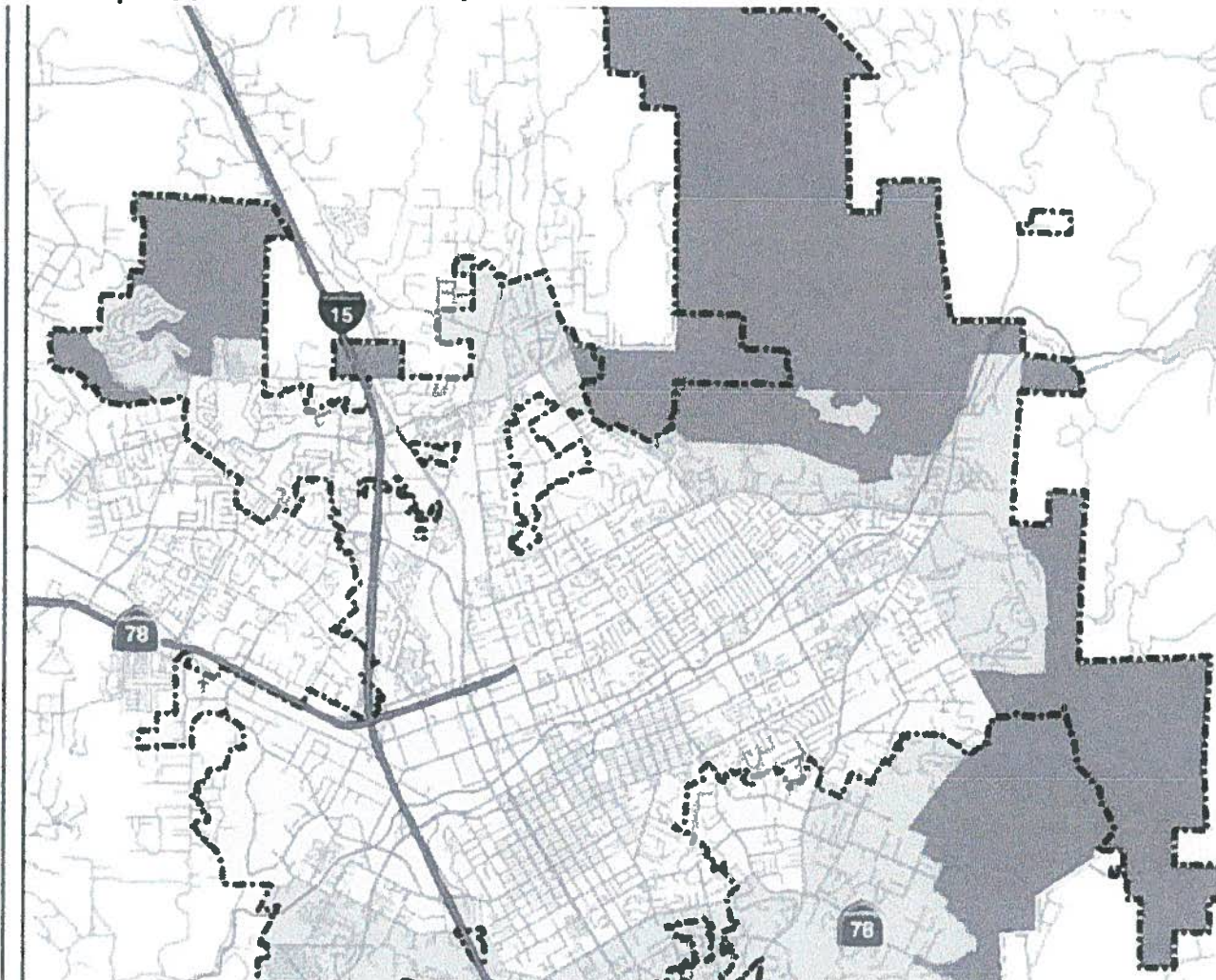
Thanks, Nadine

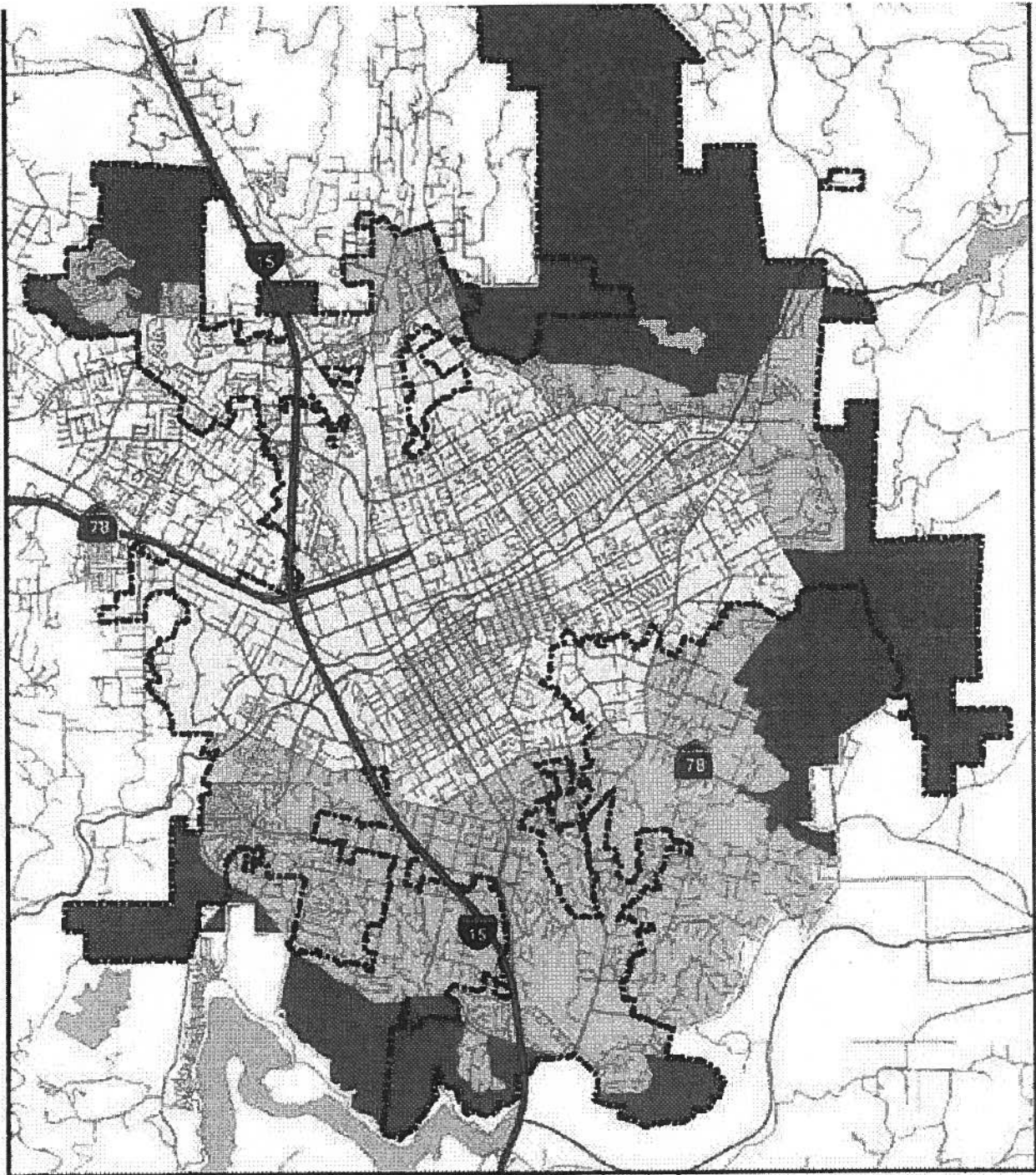
--

Make Our World Kind

This email has been checked for viruses by Avast antivirus
software.

<https://www.avast.com/antivirus>





Fire Severity Zones

- | | |
|-----------------------|-------------------|
| Severity Zones | Roads |
| VERY HIGH | Fire service area |
| HIGH | City boundary |
| MODERATE | |



November 1987



Robert Dmohowski

From: Joan Johnson <jonijohnson@mac.com>
Sent: Sunday, January 21, 2018 12:53 PM
To: Robert Dmohowski
Subject: Re: City Webpage - North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

From the Zoning map, "A- Scenic Park" zoning appears to take up 70.1 Acres and would be usurped by the the North River Farms Planned Development.

That is a huge amount of scenic park designated land for the City Council to give away. All the residents of this community will loose out by their Giveaway, and I am deeply concerned for Oceanside's park space loss.

Am I correct in that 70.1 Acre calculation?

Sincerely,

Joan Johnson

On Jan 16, 2018, at 12:02 PM, Robert Dmohowski <RDmohowski@ci.oceanside.ca.us> wrote:

Good afternoon:

As requested by residents at the December 13, 2017 EIR Scoping Meeting for the North River Farms Planned Development Project, the Planning Division has established a webpage dedicated to providing project information and updates. Please visit <https://www.ci.oceanside.ca.us/gov/dev/planning/project/nrfp.asp> . The page is located on the Planning Division's website under the "Project Search" tab. Future project documents and status updates will be provided as they become available. You may also subscribe to receive notification of future documents posted to the webpage by signing up for a subscription at <https://www.ci.oceanside.ca.us/mycity/default.asp>. When setting up an account, select "North River Farms" under the project category.

Please contact Rob Dmohowski, Project Manager, for any questions regarding the project or webpage.

Rob Dmohowski, Associate Planner

City of Oceanside Planning Division

(760) 435-3563

Robert Dmohowski

From: Joseph Miller <wooloomooloojoe@gmail.com>
Sent: Sunday, January 21, 2018 8:57 AM
To: Robert Dmohowski
Subject: Regarding subdivision propolals

Follow Up Flag: Follow up
Flag Status: Flagged

This is a bad idea. We need to slow down outer city growth and put money into fixing up the inner city. Thanks,

Joe

Robert Dmohowski

From: Deanna Lorson
Sent: Tuesday, December 12, 2017 1:26 PM
To: Jonathan Borrego; Russ Cunningham; Jeff Hunt; Robert Dmohowski
Subject: FW: No more building

Follow Up Flag: Follow up
Flag Status: Flagged

Fyi

From: Diana Cole [mailto:soosnake@hotmail.com]
Sent: Tuesday, December 12, 2017 12:46 PM
To: City Council
Subject: No more building

With the EIR tomorrow I would like to bring up the that the current situation north of the river is already unacceptable. It took us about 2 hours to go the four miles across the Douglas Drive Bridge. If the fire had jumped the two miles or so from it's western edge thousands of people could have died.

I recommend everyone email all members of the city council at council@ci.oceanside.ca.us

It would be criminally negligent to allow another 1000 or more residences be built north of the river without more bridges or other evacuation routes being built.

Sent from my iPhone

Robert Dmohowski

From: Elizabeth Bahr <elizabeth.l.bahr@gmail.com>
Sent: Thursday, December 14, 2017 8:07 AM
To: Robert Dmohowski
Subject: North River Farms Planned Development

Follow Up Flag: Follow up
Flag Status: Flagged

Hello, Mr. Dmohowski:

I am an Oceanside resident that resides in the Arrowood Community. I would like to be kept informed and receive all public information and updates on the North River Farms Planned Development.

I am gravely concerned about this planned development's impact on our region of Oceanside. My family was impacted by last week's Lilac Fire. We saw firsthand how difficult it was for current residents to evacuate the area once we were placed on mandatory evacuation orders. Once mandatory evacuation orders were issued and everyone hit the road, people sat in their cars for 2+ hours, only moving 1-2 miles along Douglas Road, Vandegrift Road, and other "emergency evacuation routes." In fact, some families were stuck so long on the road, that they felt there was nothing they could do but to turn around and go back home to their at-risk home, during the mandatory evacuation. It was harrowing, and unacceptable. This put peoples' lives at risk.

In the context of the planned North River Farms development: without any thought or required planning into widening existing roads or increasing emergency evacuation routes, adding 1,000+ people to this community will lead to catastrophe when (not if) another wild fire break out.

Please keep me informed as these plans develop.

Thank you,
Elizabeth Bahr
1049 Breakaway Drive, Oceanside, CA

Robert Dmohowski

From: Tandy Pfof <tandy.denny@gmail.com>
Sent: Thursday, December 14, 2017 1:26 PM
To: City Council; Robert Dmohowski; Tandy Pfof
Subject: South Moro Hills Proposed Development

Follow Up Flag: Follow up
Flag Status: Flagged

City Council and Associate Planner,

I was not able to attend the public scoping meeting Wednesday Dec.13 on the **South Moro Hills Proposed Development**. Therefore, I am expressing my input via email. I was notified of this meeting by the Arrowood HOA with no notification by Oceanside.

Days after the recent fires that stopped short of the general Arrowood area, how can new development do anything but make fire hazard worse. Adding to this how about a) flood zones, b) environmental hazards such as run off into the ground water, c) traffic on North River Road, d) school impact, e) taxpayer burden from having to address all these issues. There is way too much information missing.

It is incredulous that City Council has given any support to this proposal when committee recommendations proposed to reject it. Progress is not always bad, but there is nothing good to say about this one, Are there serious payoffs or what? Why are developers major contributors to City Council? Why is this allowed? Is it irresponsible? criminal? This developer is only interested in making money with no concerns of what is left in the aftermath for the city to contend with.

Please do not do this...

I thank you so much for your attention to this matter.

Tandy and David Pfof
Arrowood Community

Robert Dmohowski

From: Deanna Lorson
Sent: Thursday, December 14, 2017 8:24 AM
To: Jonathan Borrego; Jeff Hunt; Robert Dmohowski
Subject: FW: River Road Housing Development

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

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

From: TOM EDMONDS [mailto:tbonafide1212@att.net]
Sent: Thursday, December 14, 2017 8:22 AM
To: City Council
Subject: River Road Housing Development

Hi,

I am totally against the river road housing development. Please vote to keep space open to agriculture use only! I used to live in oceanside and now live in bonsall. I travel north river road every day to work on Camp Pendleton. I love seeing all the hard working people growing good for our families. Please vote NO on housing development!!!!

Tommy Edmonds

Robert Dmohowski

From: Karen Green <greenka111@sbcglobal.net>
Sent: Friday, December 22, 2017 3:22 PM
To: Robert Dmohowski
Cc: lb1122@hotmail.com
Subject: Fwd: Proposed North River Farms Development

Follow Up Flag: Follow up
Flag Status: Flagged

- >
- > Thank you for extending the public comment period for the subject project until after the planned January scoping meeting added by the City due to the recent fire in our neighborhood.
- >
- > Below are some preliminary comments. I plan to provide more detailed comments after the January meeting and further review of the applicant's documents posted on eTRAKIT.
- >
- > 1. There are many environmental issues with the potential for significant impacts with the project, as proposed. The NOP lists 19 issue areas for analysis, I agree that all that are listed should be analyzed and none should be dropped from the analysis.
- >
- > 2. Cumulative impacts are of particular importance with this project due to the sought amendments to the General Plan and Zoning, and precedent setting potential for growth inducing impacts. Getting the assumptions right for this analysis is critical to ensure that the City and its residents have a good understanding of the likely environmental and economic impacts of the project in combination with a foreseeable future condition with growth of a similar type as sought by the project. An analysis that limits the foreseeable future of the project in combination with existing agricultural land use would underestimate the potential impacts (by failing to consider growth inducement) and underestimate mitigation requirements for this project to the detriment of the community, following projects, and City.
- >
- > 3. A robust alternatives analysis for this project is recommended so that the City decision makers and residents have information necessary to consider alternatives capable of eliminating or reducing significant environmental impacts. Along these lines, it is recommended that one alternative conform to existing General Plan and Zoning for the project area. In light of the agri-tourism visioning for the Morro Hills community that has taken place over the last couple of years in coordination with the City, it is recommended that an alternative be developed in coordination with the agri-tourism committee that considers future allowable agri-tourism uses that would lessen potential impacts and conflicts with agriculture.
- >
- > 4. Traffic impacts are a significant concern. The analysis should consider that North River road (NRR) receives equal traffic flow both east and west, is a route used daily by military and civilian workers at Camp Pendleton, and is an emergency evacuation route for Oceanside and Fallbrook. Mitigation to lessen significant impacts should consider extending road improvements on NRR east to SR-76 and possibly construction of a new bridge over the San Luis Rey River at Melrose to connect with NRR.
- >
- > 5. Proposed construction in 100-year floodplain is a significant concern. Significant flooding with wash out of North River Road has occurred with prior El Niño events. The Army Corps flood control project mitigates potential flooding impacts west of College to Pacific Ocean, but does not protect property further east within the proposed project area. Similar flood control mitigation requirements should be considered for the proposed project, alternatively an alternative that restricts development from the 100-year floodplain should be considered.

6. The proposed project will significantly impact prime farmland, unique farmland and farmland of statewide importance. In addition, the proximity of high density development has the potential to conflict with existing agricultural and significantly curtail the long term viability of large scale agriculture in Morro Hills. Mitigation to reduce conflicts with nearby agriculture should consider more substantial and sufficient buffers. However, mitigation to address significant impacts associated with loss of important farmland may not be possible unless acre per acre conservation by legal instrument of similarly important farmland in the City is considered.

>
> Respectfully submitted,
> Karen Green
> South Morrison Hills Resident
>
>
> Sent from my iPhone

Robert Dmohowski

From: Bev Hansen <bhan9627@aol.com>
Sent: Thursday, December 28, 2017 4:16 PM
To: Robert Dmohowski
Subject: Melba Bishop Development

Follow Up Flag: Follow up
Flag Status: Flagged

I'm against this. I live in northeast Oceanside. They are presently building a development near the Mission. I'm concerned about the water usage and how we and all these people will pay for it and it's availability. It's bad enough now. With another draught coming on, I think newcomers will get nothing out of their taps.

Beverley Hansen
Brisas St

Robert Dmohowski

From: Destiny Colocho <DColocho@RinconTribe.org>
Sent: Thursday, December 28, 2017 11:19 AM
To: Robert Dmohowski
Subject: North River Farms Planned Development Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your **Notice of Preparation of an Environmental Impact Report for the North River Farms Planned Development Plan** and we thank you for the opportunity to provide input regarding the scope and content of the EIR. The location you have identified is within the Territory of the Luiseño people.

Embedded in the Luiseño territory are Rincon's history, culture and identity. The project is within the Luiseño Aboriginal Territory of the Luiseño people. Rincon has knowledge of one Luiseño Place Name, *Pá'qwa*, directly adjacent to the project area. Luiseño Place Names are associated with cultural traditional practices such as food gathering/processing, gatherings, and ceremonies. For this reason, the Rincon Band suggests the following measures be implemented in the EIR. These measures have been implemented by other lead agencies in this area for projects such as North River Farms Planned Development Plan.

CUL-1: The Rincon Band recommends the applicant enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe") prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.

CUL-2: Prior to issuance of a grading permit, the applicant shall provide written verification to the City of Oceanside that a qualified archaeologist and a Native American monitor associated with a TCA Tribe have been retained to implement the monitoring program. The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City of Oceanside in a letter from the project archaeologist that confirms the selected Native American monitor is associated with a TCA Tribe. The City of Oceanside, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

CUL-3: The qualified archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

CUL-4: During the initial grubbing, site grading, excavation or disturbance of the ground surface, the qualified archaeologist and the Native American monitor shall be on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring

will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

- CUL-5:** In the event that previously unidentified Tribal Cultural Resources are discovered, the qualified archaeologist and the Native American monitor shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.
- CUL- 6:** If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of Oceanside of said discovery. The qualified archaeologist, in consultation with the City of Oceanside, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City of Oceanside for review and approval. If avoidance of the discovered cultural resource is not feasible, there should be an option to rebury the cultural material in or near the location it was discovered where it won't be disturbed by future development.
- CUL-7:** The avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant Tribal Cultural Resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City of Oceanside, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City of Oceanside. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City of Oceanside.
- CUL-8:** As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.
- CUL-9:** If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified Archaeologist does not collect the cultural resources that are unearthed during the ground disturbing activities, the Native American monitor, may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Any Tribal Cultural Resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the

TCA Tribe or other traditionally and culturally affiliated tribe decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.

CUL-10: Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion of the archaeological monitoring program and any data recovery program on the project site shall be submitted by the qualified archaeologist to the City of Oceanside. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.

If there are any questions or concerns please do not hesitate to contact our office at your convenience at (760) 297-2635. Thank you for the opportunity to protect and preserve our cultural assets.

Destiny Colocho, RPA

Cultural Resource Manager

Cultural Resource Department

Rincon Band of Luiseño Indians

1 West Tribal Road | Valley Center, CA 92082

Office: 760-297-2635 | Cell: 760-705-7171

Fax: 760-692-1498

Email: dcolocho@rincontribe.org



This message is intended only for the use of the individual or entity to which it is addressed. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the sender of this E-Mail by return E-Mail or by telephone. In accordance with Internal Revenue Service Circular 230, we advise you that if this email contains any tax advice, such tax advice was not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of avoiding penalties that may be imposed on the taxpayer.

Robert Dmohowski

From: Diane Nygaard <dnygaard3@gmail.com>
Sent: Friday, December 29, 2017 8:48 PM
To: Robert Dmohowski
Subject: Comments on North River Farms NOP

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Dmohowski

We very much appreciate that the city is proposing to do a comprehensive EIR analysis and has not arbitrarily determined some issues should be excluded. Thank you for putting the environment and the community first. The following are our comments on the scope of the NOP:

Land Use

SANDAG has assumed that each city in the region will comply with the provisions of the Sustainable Communities Strategy(SCS) to integrate land use and transportation planning. This includes the expectation that the majority of growth in the region through 2050 will occur at 200 Smart Growth(SG) sites. The DEIR needs to evaluate how this project complies (or fails to comply) with the provisions of the SCS, This should include an analysis of what growth has occurred in Oceanside since adoption of the SCS and what percentage of this growth is within 1/4 mile of a designated SG site, and how this specific project will impact the ability to comply with this regional land use plan.

Housing

The applicant provided an explanation as to how this project is essential to address housing needs- both for Oceanside and for the region. This self serving statement fails to consider the viability of the adopted Housing Element of the city of Oceanside- that achieves the RHNA numbers without this project. Furthermore adding more high cost housing that requires increased VMT is the exact opposite of smart growth and what regional and state housing guidelines are trying to achieve. The DEIR needs to fully evaluate if this project is needed to achieve Oceanside or regional housing numbers, by income levels if this project is consistent with the adopted Oceanside HE and regional housing needs, and how the proposed housing mix complies with guidelines for design and location of real "affordable"housing.

Agricultural Land

The land impacted by this project is designated as "prime" agricultural land. Appendix G of CEQA Land Evaluation and Site Assessment (LESA) provides a systematic method of determining impacts to prime agricultural land. The DEIR must 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 Morro Hills to other uses.

The pattern of agricultural land loss in coastal southern California is very clear. The adjacent city of Carlsbad is a perfect example of how one by one agricultural land is lost to the pressures of development. This is often not because farmers want to stop farming, But because adjacent land uses put added stress on farming operations. New development ends up being named for what it has replaced- like Rancho Carillo, Bressi Ranch, and Robertson Ranch, The generational owners of Robertson Ranch said once a 4 lane divided road separated their farm fields that was the last straw for them. The North River Farms project is likely to become

that critical step in the loss of Oceanside agricultural lands. The DEIR needs to consider how converting this one piece of land historically has started the dominoes falling.

Biological Resource Impacts

The city of Oceanside's draft Subarea Plan(SAP) has identified the northeastern part of the city as an Agricultural Exclusion Zone. It recognizes that agricultural land use provides some value for the conservation plan as long as those land uses continue and there is no removal of existing natural habitat. This is the first project to convert these agricultural lands to other uses. If approved, this project is likely to result in substantial additional loss of these ag lands. The DEIR needs to fully assess how the project complies with all of the general provisions of the SAP as well as the specific provisions identified in Section 5.3.3 of draft SAP. The analysis needs to consider both project specific and cumulative impacts to biological resources.

In addition, the DEIR needs to assess how project approval could impact the draft SAP- especially since it would appear there is not sufficient available land to accommodate the required compensatory mitigation.

Public Safety

Several persons testified at the NOP community meeting about their experience with trying to evacuate during the recent Lilac Hills Fire. A comprehensive Fire Risk Assessment is needed for this project. The San Luis Rey River is already a high fire risk area with a pattern of frequent fires intentionally set by arsonists. This is exacerbated by the current conditions of invasive arundo donax and delays in vegetation clearing and the on-going long term impacts of climate change. See San Diego Foundation study San Diego's Changing Climate:A Regional Wake-up Call." for a discussion of some of these issues. This Fire Risk Assessment also needs to include the additional risks during Santa Anna wind conditions.

This analysis also needs to consider the issues raised in a recent OpEd in the LA Times "

Why are California's homes burning? It isn't natural disaster it's bad planning"

<http://www.latimes.com/opinion/op-ed/la-oe-halsey-socal-fires-why-20171207-story.html>

Greenhouse Gasses

It is our understanding that the developer proposes to offset their increased GHG through the use of off site GHG reduction- that is out of state. The DEIR needs to consider acceptable ways to reduce the GHG caused by this project. There is currently no mechanism allowed through any local or state action that would allow Oceanside, or any California city, to off set the GHG produced within the community outside the community or even outside of the state. The project needs to be evaluated for compliance with state law related to GHG reductions for local emissions, regional plans for GHG reduction, and consideration of the currently in process Climate Action Plan for the city of Oceanside.

Growth Inducing

The DEIR needs a thorough evaluation of the growth inducing impacts of such a precedent setting land use change- converting ag land to dense housing. The cumulative impact assessment needs to be realistic about how one project will lead to others- based on the clear pattern established in other cities in this region. Estimates are this could lead to 8,000 or more housing units converting thousands of acres of land in an area that was never planned for such intensive land use.

Cumulative Impacts

This analysis must be realistic- not just looking at already approved /potential projects but the actual story of how such changes start the dominoes falling. This analysis needs to consider all of the environmental impacts of massive land use changes from converting ag land to other uses, particularly dense residential as that is the pattern throughout Oceanside.

Overriding Considerations

It is expected that this project., similar to essentially every other project of this size in recent years, will result in at least some significant adverse impacts that could lead to a statement of "Overriding Considerations." Such statements typically include the economic benefits of the project as part of the justification for accepting adverse environmental impacts. It appears that the Economic Analysis submitted by the developer is their justification in support of such a statement of Overriding Considerations. The conclusions of this self serving economic analysis are in conflict with numerous other such analyses that have been done for other projects. It concluded that single family residences would result in a net gain to the city while other studies consistently show they are a net loss. Any justification for overriding considerations must be done by an independent third party and not the applicant. This is particularly so with any economic analysis that is used to support a decision to override adverse environmental impacts.

Alternatives Analysis

The CEQA process requires that the impact analysis needs to determine what alternatives need to be considered to address adverse impacts. We expect that this requirement will be taken seriously and that once adverse impacts have been defined alternatives will be developed that are specifically designed to reduce those impacts below the level of significance. A serious effort to do that is at the heart of the CEQA process so there truly can be informed decision making.

Please reply to confirm timely receipt of these comments.

Thank you for your consideration.

Diane Nygaard
On Behalf of Preserve Calavera

zoning letter.txt

Development Services Department
Attn: Rob Dmohowski

I am writing regarding the plan led by Councilman Kern to change the zoning for the area east of Melba Bishop Park.

I was born in Oceanside in 1936 at the old hospital off of Horne Street and graduated from Oceanside High School in 1953 and Oceanside Junior College in 1955.

I grew up in this area and was only away during WWII when our family lived in Ventura and Riverside Counties while my dad was a basic training flight instructor for the Army Air Corps.

My parents had purchased five acres of land on Wilshire Road. We would come down on weekends and my brother Mel and I, though young, helped our dad build a temporary house that would later be modified into a permanent home.

Our family has resided at 284 Wilshire Road ever since 1945. Our cousin Charles Stokes purchased the land just below us and raised his family there.

After college I went to work for Pacific Tel & Tel in Oceanside. Then I was drafted into the Army and when I came home I soon married and started my own family in Vista.

Much later, well after my father died, I came back to my childhood home to help my ailing mother in her later years. Of course after she passed away I stayed on at the Wilshire property.

We once had a 20 tree orchard east of the house but during the years after my father was gone my mom could not tend to it and it gradually went away. My cousin had still has multiple fruit trees as this is a fine area for agriculture.

We had all lived good honest lives and planned to live out the remainder of our life in the peace and quiet of our homes.

But then came the announcement that there might be a housing project just across the street. I was aware of the zoning and did not expect this to actually occur. We went to the first City Council meeting that was to discuss it. There was a large number of neighbors attending and we waited for well over an hour for our turn. Then the Mayor announced that due to the large number of people they would postpone the

zoning letter.txt

discussion until a later date.

Later we were informed the Planning Commission was meeting in the Council Chambers and we attended that meeting. Since the Planning Commission unanimously voted against a zoning change we were quite relieved.

Next we went to Council meeting where the initial speakers were not in support of the zoning change.

Then out of the blue Councilman Kern seemed to be lobbying for the change. Obviously he did not know or care what the residents of that area thought about the matter. Nor did he care what the planning commission recommended. I guess we don't need that commission.

At that point my cousins family and I could see that common sense might not prevail and we could see our input would not matter once certain members of the council had already decided.

So we never attended any of the subsequent meetings. Our voices did not matter.

It would have been wonderful if we could live out our lives in the peace and quiet of our own homes but that is not looking like a certainty now.

I don't understand how a person without empathy for his fellow man would want to be in public service.

The residents in this area have certainly made their feelings known.



Donald Johnson
284 Wilshire Rd.
Oceanside

Jan, 25, 2018

Robert Dmohowski, Associate Planner
Planning Department, City Of Oceanside
300 N. Coast Highways, Oceanside

re: North River Farms

Dear Rob;

After our meeting with Integral on Jan 22, it was disturbing to know the plans to mitigate the agricultural land outside the Oceanside City Limits.

I would respectfully request that the City require any developer to mitigate agricultural land loss to development within the city limits. Our efforts to create an Agritourism component for the city strengthening our visitor experience, the cities environmental and climate change needs as well as Green Oceanside's efforts to close the waste loop, our water departments efforts to sell recycled water to farmers and most important to preserve our commercial farming element in Oceanside is essential that we have as much agricultural land as possible.

Sincerely;

Louise Balma

Architect
745 Sleeping Indian Road, Oceanside

Robert Dmohowski

From: nursekrajec <nursekrajec@gmail.com>
Sent: Saturday, January 27, 2018 3:02 PM
To: Robert Dmohowski
Subject: North river farms development plans

Follow Up Flag: Follow up
Flag Status: Flagged

I live off Frazee and the 76 and would like to know how this development would impact traffic. The addition of a second turn lane along the 76 hasn't done anything to help improve the traffic as it gets so backed up you can't even get into the turn lanes. There needs to be a widening and adding of lanes going straight to the 76 if we continue to develop the community. It used to take about 10min to get from my home to I5 in the morning and now it sometimes takes up to 20min especially when the kids are in school.

You are adding housing without looking at the bigger impact to our community. There is not enough room for the additional cars and homes. There needs to be something else done with the land. Possibly a business that will bring jobs and only temporary traffic during business hours and not all the time. Oceanside needs more business to provide jobs for it's citizens.

I urge you to please ask the surrounding community about how bad traffic is all the time and see how this development will make it worse.

Thank you,
Amy Krajec
4781 Dalea Pl
Oceanside CA 92057

Sent via the Samsung Galaxy S7, an AT&T 4G LTE smartphone

Robert Dmohowski

From: Harold Zettl <hzettl@gmail.com>
Sent: Saturday, January 27, 2018 6:13 PM
To: Robert Dmohowski
Subject: North River Farms project .

Follow Up Flag: Follow up
Flag Status: Flagged

Hi ,
my name is Harold Zettl and I live on Chincoteague Ct .
I oppose the project because of it's density and impact on the traffic on River Road as well as HWY-76. There is no clear defined evacuation plan or exit route , as we all experienced issues during the Lilac fire. This project with it's 725 units will add about 1500 cars to the local area , which is already not able to handle the current traffic.

--

Thank you ,

Harold

You only need two tools in life - WD-40 and duct tape. If it doesn't move and should , use the WD-40. If it shouldn't move and it does , use the duct tape

Robert Dmohowski

From: Sandy McReynolds <sandy.mcreynolds@gmail.com>
Sent: Saturday, January 27, 2018 6:27 PM
To: Robert Dmohowski
Subject: North River Farms project

Follow Up Flag: Follow up
Flag Status: Flagged

We oppose development such as this. All development should be beside transportation hubs, preferably rail and bus. This one is neither, nor it is close to schools, shops, and markets.

Note how long the Lilac fire evacuation took, and this would be so much worse.

John F. McReynolds
5822 Ranch View Rd.
Oceanside CA 92057

Robert Dmohowski

From: Joseph Sanford <Joe@joesanford.net>
Sent: Saturday, January 27, 2018 11:27 AM
To: Robert Dmohowski
Subject: North River Rd development

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

In your plans for the North River Rd development, would you please consider creating another access point to NRR from Melrose? During the recent fires, NNR was overwhelmed with cars trying to exit from both NNR and Sleeping Indian Rd. The only way out for them was at College Blvd. Melrose is already built to handle a considerable amount of traffic on both sides of 76 and if it were completed around Guajome Park to Santa Fe, it would give much needed relief to the current traffic bottlenecks. I would also like to add that there are currently two large apartment complexes, in the permitting stage, for the east and west sides of Santa Fe at Oceanside Blvd and Bobier that I feel are only going to add to the traffic along 76. A study on this Melrose/Santa Fe area has not been done since 1999 and there have been major changes since then.

Please consider at least looking at this option.

Thank you

JOE

Joe Sanford
760-631-4000 office
760-846-3900 cell
joe@joesanford.net

Robert Dmohowski

From: Karen Johnston <karejohnston@gmail.com>
Sent: Saturday, January 27, 2018 8:41 PM
To: Robert Dmohowski
Subject: North River Farms Project EIR (Environmental Impact Report)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski-

Please include in the EIR for the North River Farms Project the following topics:

Light Pollution-

The North River Farms Project would permanently and irreversibly degrade natural nighttime darkness. This will have a negative effect on native wildlife and ecosystems.

The North River Farms development and associated vehicle traffic would add significant artificial light to the night sky. This would go against the efforts of the International Dark-Sky Association, which values and seeks to protect nighttime darkness. IDA is a non-profit 503(c) organization that works to help stop light pollution and protect the night skies for present and future generations.

The area around Camp Pendleton Marine base has relatively low levels of light pollution, and should remain that way. For the benefit of wildlife, astronomers, and for citizens who do not want to become increasingly disconnected from the natural environment.

School Safety-

North River Road has a reduced-speed school safety zone for Del Rio Elementary School, located just one-third of a mile west of the proposed development. A significant housing development at the proposed location would increase the density of traffic on North River Road. It would lead to greater impatience of drivers, more tailgating, reduced visibility, higher speeds, more passing, more drivers missing the warning lights, and a greater danger to students.

Reducing the safety of young students is never a good idea, and should not occur without careful consideration.

The North River Farms development, if approved, would almost certainly be followed by numerous "copy-cat" developments in the area, which would follow the North River Farms template. Both the "Light Pollution" and the "School Safety" topics need to be addressed using the ultimate housing numbers that would result from not only the North River Farms development but also from all the likely future projects it would enable.

Sincerely,

Karen Johnston

1544 Sleeping Indian Road
Fallbrook, CA 92028

Robert Dmohowski

From: unk Jammal <jammaloo@gmail.com>
Sent: Saturday, January 27, 2018 6:16 PM
To: Robert Dmohowski
Subject: North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

Please accept this email as my input to subject planned development. Subject development should not be allowed. While available housing in SD County is badly needed, this planned development will likely have more negative impact and provide little relief to housing shortage. 76, college Blvd. and N River road are already impacted by traffic; the planned additional units will just make things much worse. To approve any development in this location should require a traffic mitigation plan that widens North River Rd from 76 to Vandegrift in addition to the college Blvd. bridge. Development should also include shopping amenities, which are now lacking from College East to the Bonsall area. The City Council/Planners should not allow another developer to just plant homes; developers need to build full communities; Carlsbad, and other cities demand more from the developers; Oceanside should too.

Thank you for your time.

Sam Jammal
5584 Thoroughbred St
Oceanside, CA 92057

Robert Dmohowski

From: Bruce <lincarguy@earthlink.net>
Sent: Sunday, January 28, 2018 6:27 PM
To: Robert Dmohowski
Subject: EIR North River Farms

Follow Up Flag: Follow up
Flag Status: Flagged

FIRE CONCERNS AND NORTH RIVER FARMS

1/28/19.

I attended the meeting on the EIR for North River Farms and was quite surprised to find that fire was not listed on the EIR concerns list. We have just had a significant fire which has certainly affected the environment. Trees and brush east of Mission in Bonsall the entire river bed was wiped out. The habitat was destroyed for virtually every kind of wild life. The river bed now has no trees and brush to slow the rush of water that could be coming from the mountains so bridges, roads and buildings are vulnerable to high speed water in the river bed. I know that this area is not in Oceanside but it certainly can affect Oceanside. More to the point is the river bed from roughly Sleeping Indian to the west end of the agricultural fields has extremely dense brush and trees. This woodland makes me uneasy every time I drive by it because of the risk of it becoming a major fire. I understand from a number of people that this woodland is not under the control of the city and that who ever it is under the control of it will not allow any kind of thinning or management of the woodland. Their philosophy is clearly that it is better to let burn to ash and destroy all habitat than to have any mitigation of the fire risk and still have a viable habitat for wildlife. I have been here 8 years and I am frankly amazed it hasn't burned before now. This forest is on the south border of the highest density of the proposed North River Farms. The narrow border between the forest and the high density housing laughingly referred to as a farm is absolutely no realistic fire break. If the woodland burns at least part of North River Farm burns.

Worse at Sleeping Indian there is a small stream bed that is usually dry that runs north through a nursery and then along Sleeping Indian through private land much of which is covered with dense brush as far up as the lemon orchard. If the woodland at the river bed burns fire will sweep up this stream bed endangering all the houses along that section of Sleeping Indian and maybe further north.

If North River Farms is built the risk of fire goes up dramatically. Fire can come from many sources, such as, from kids playing in the forest, cars back firing, burning trash, etc. Human proximity increases the risk is one of the many many reasons why North River Farms should not be built.

It is probably to say this but I support all the other reasons for not accepting the North River Farms plan.

Bruce Hauswirth

697 Sleeping Indian Rd

Oceanside, Ca

92057

Robert Dmohowski

From: FL Talavera <talaveraassoc@gmail.com>
Sent: Sunday, January 28, 2018 10:29 PM
To: Robert Dmohowski
Cc: Russ Cunningham
Subject: North River Farms Project NOP - Public Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Rob,

Per the Notice of Public Scoping Meeting, public comments must be submitted by January 30, 2018. This public comment addresses concerns with the North River Farms Project Application and related entitlement requests.

North River Farms Project Application Entitlement Requests

The North River Farms Development Project Application is comprised of the following Entitlement Requests:

1. General Plan Amendment (GPA16-00002): A change in land use designation from Agricultural (A) to Single-Family Residential (RS), Medium Density Residential (RMA, RMB, RMC) and Mixed-Use.
2. Zone Amendment (ZA16-00005): A zone amendment from Agriculture (A) and Agriculture - Scenic Park Overlay (A SP) to Planned Development (PD).
3. Tentative Map (T16-00002): A tentative map to establish the four Planning Areas.
4. Development Plan (D16-00012)

The Entitlement Requests must be reviewed for major inconsistency with the General Plans, the California Coastal Act, North County Multiple Habitat Conservation Program, and the Williamson Act (a legislative effort to preserve agricultural and open space land and discourage premature urban development). The proposed General Plan Amendment is inconsistent with Oceanside's General Plan and San Diego County's General Plan. The change in land use designation from Agricultural, a dedication to its use for agricultural and open space land, discouraging premature urban development, to Single-Family Residential (RS), Medium Density Residential (RMA, RMB, RMC) and Mixed-Use is inconsistent with the above to the extent that it fails to properly consider the effects and the cumulative effects or impacts it will have on preexisting infrastructure, which is otherwise inadequate to handle the massive increase in circulation that would result from changing the land use designations from agricultural to single and medium residential. The proposed North River Farms Project falls within the boundaries of the Agricultural Preserve established by the City of Oceanside Planning Commission Resolution No. 78-P10 Agricultural Preserve No. AP-2-77, AP-3-77, AP-4-77 and AP-5-77 Location: North of North River Rd., bet Stallion Dr. and Sleeping Indian Rd.

Under existing conditions, the Traffic Study (TIR) lists North River Road as meeting City of Oceanside Circulation Element classification as a Four Lane Major Arterial between Douglas Drive and College Boulevard and as a Five Lane Major Arterial from College Boulevard to Vandegrift Boulevard. However, the project application proposes a General Plan Amendment to reclassify North River Road from Stallion Drive to Wilshire Road from a Major Arterial to a Secondary Arterial. This is inconsistent with the proposed changes in land use designations discussed above, as a major arterial would be necessary to support the proposed increase in density which would only exacerbate the current load of commuter traffic from the Temecula area to Camp Pendleton,

as well as 24/7/365 semi-trailer traffic from local Fallbrook and Oceanside nurseries, flower growers, strawberry and tomato growers. Further, the TIR improperly assumes that the long-term volume forecasts do not justify the need for a Four-Lane Major Arterial.

Multiple areas within the project development are subject to the jurisdiction of the U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). Those agencies must be properly notified, well in advance, of the Notice of Preparation.

Please confirm receipt of these comments and that they have been entered into the public record. Thank you!

Sincerely,

Lynn Talavera

Robert Dmohowski

From: Marc Rice <ricema@gmail.com>
Sent: Sunday, January 28, 2018 12:40 AM
To: Robert Dmohowski
Subject: North River Farms Development

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

As a 25 year resident of Oceanside, I have witnessed a lot of bad decisions by our City Council that adversely affect our quality of life here. Many, many times the council has gone against the Planning Department's recommendations to allow re-zoning for development, allowing more high-density housing than the roads can support. I won't even get into the whole RDO street light fiasco, which I will never stop being pissed off about. And blocking the Rancho Del Oro offramp from the 78 which was planned to go straight into the business park, hindering commercial development there (oh, but that's OK, we'll just re-zone and put condos in there, right at the corner of College and Old Grove!!!) But I digress....

The point is, I am writing to voice my opposition to the North River Farms Development, as well as any other development that will put more traffic on 76 or College Blvd. Especially high density development as proposed in this case. Not that the City Council will give a hoot. They'll do whatever the developers want. I wonder why?

Marc Rice
RDO Resident

Robert Dmohowski

From: Tom Chiesl <tchiesl@yahoo.com>
Sent: Sunday, January 28, 2018 4:16 PM
To: Robert Dmohowski
Subject: North River Farms planned development plan

Follow Up Flag: Follow up
Flag Status: Flagged

Hi,

I'm an Oceanside resident that lives over by mission vista high school and I was given your e-mail address and told by a neighbor I have until Jan 31st to voice any concerns regarding the planned North River Farms development.

While I think that more housing is needed in the East Oceanside area and it has a great future for residential and commercial development, my primary concern is that the existing traffic is already snarled enough as it is on the 76 and the approaching North South intersections to try and get on the 76 (College in both directions, Santa Fe, the stoplight to / from walmart). I had considered buying a house in the Arrowood development but after visiting at both morning and evening rush hour decided against that as like something in a Simpsons episode an old lady in a walker passed me by. The timing of lights is also nearly impossible to travel east west on the 76 and any reasonable rate of speed and I fear another housing development in an area with already choked streets will only exacerbate the problem. I think more improvements to the transportation infrastructure (road system, not busses, not trains) is need to lay the foundation for the next 20 years. I had high hopes for the construction that was happening on 76 throughout oceanside but the end result looks like we just took the nice brick median blvd like divider and replaced it with a wide shoulder and some shitty looking dirty spaces. I assume the wider shoulders are for emergency vehicles which is good, but there are definitely places that could use more lanes and or better timing of the lights.

Positive element(s) that I like about the planned new development are the mixed used of residential and agricultural / open space. Our HOA has some open space and eventually I will try to pitch an avocado tree grove, I'm sure our HOA could team with other HOAs and supply avocados and other produce to the local sprouts which would be a win / win for everyone.

Thanks for your 2 minutes.
Tom Chiesl

Robert Dmohowski

From: Irma Robinson <irmarobinson@yahoo.com>
Sent: Monday, January 29, 2018 4:07 PM
To: Robert Dmohowski
Subject: No on N.River Rd. Housing!!!

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from my iPhone

Robert Dmohowski

From: Sabrina Locher <sabrinaloher@yahoo.com>
Sent: Monday, January 29, 2018 9:35 PM
To: Robert Dmohowski
Subject: Objection to the Proposed North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear City of Oceanside,

I was very distressed to learn at a recent homeowners association meeting last week that there were plans being discussed with the support of several members of the City of Oceanside's City Council to build the North River Farms Project very close to our community. You see my husband and I moved to Oceanside from Carlsbad approx. 4 1/2 years ago when we purchased a home in the Marisol at Ocean Ranch community off of Melrose, next to Mission Vista High School. We previously lived very close to the 5 freeway in Carlsbad off of Tamarack Ave and had started to feel the pressure of the added traffic congestion on the 5 freeway. Moving out to what we considered, rural Oceanside was a break from all of the traffic noise and congestion. We considered several areas in the Morro Hills section of Oceanside and after ruling out Arrowwood based on the traffic flow (one way in and one way out being a negative for us) and settled on our neighborhood because we were assured that the natural farming land and previous riverbed surrounding our neighborhood would stay open space as it was not able to be built on for additional homes or businesses. The added improvements that we saw starting to take place and have now finished to the east sections of the 76 section have also helped to keep up with the increase of traffic that we have seen in the short time we have lived here. Our concern with this new North River Farm Project is that in addition to the new neighborhood being built next to the San Luis Rey Mission bringing hundreds of homes and more traffic to the 76, is that by adding the North River Farms project and increasing the number of homes in our area by another 700+, you are adding almost a guaranteed, another 1000+ vehicles to the already over crowded streets and shopping centers in our area. As an example, some days, the later afternoons in the middle of the week, it takes me 30-40 minutes to get from the Walmart parking lot, on the corner of College and 76, to my house, which is approx. 2.3 miles using the 76. To me, that clearly indicates that we are already at capacity on our streets around here. Adding more to the mix is not the answer.

The second pain point for me is that, as previously stated, we were told the open space surrounding our neighborhood was undevelopable. I know some in our neighbors paid a premium for their lots as they were outward facing with a view of the open spaces. I would think they would be the most vocal about that view and peace and quite being taken away after only being able to enjoy it for a few short years.

I was born and raised in this area as the daughter of a Marine Corp brat so I have seen Oceanside grown from a small little town with mostly military families to the larger, more diverse town it is now. I would not have moved back here if I thought it was going to become as overfilled as it is being proposed to be. And please do not get me wrong. I'm not against progress but I ask that you just look at the big picture and spread these developments out so that we are not all on top of each other and the infrastructure is in place to support the growth of new communities and you are not trying to play catch-up and fix a problem after you have already created it. The beauty of living in this part of Southern California is that we still have room to breathe. Please don't take that away.

Respectfully,
Sabrina Locher
Chincoteague Ct

Oceanside, CA 92057
760-688-8611-cell

Robert Dmohowski

From: Carol Brazeau <cbraze@me.com>
Sent: Tuesday, January 30, 2018 2:36 PM
To: Robert Dmohowski
Subject: River Road project = More traffic and lower quality of life

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

i would like to state that I am totally against the River Road housing project. I moved to this area to get away from dense housing and heavy traffic. And now there's a possibility that I will be facing the same issues as there are in the Bay area? I am so against this.

Isn't there a way for the public to vote on this? I think the majority of the people living in this area are against it. I heard that at the meeting EVERYONE was against - except the city council members. I think they should do what the majority of the population prefers.

Carol Brazeau
5611 Chincoteague Ct
Oceanside, Ca 92057
650-823-9958

Robert Dmohowski

From: Dave Hamilton <dhamilton@ntecusa.com>
Sent: Tuesday, January 30, 2018 1:12 PM
To: Robert Dmohowski
Subject: FW: NRF Planned Development

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Dmohowski,

This email is in concern for the environmental Impact Report.

I am opposed to this project for the environment noise, greenhouse gases and the project too close to the river for flood reasons.

On the first two reasons is the city of Oceanside has a huge problem in the eastern half of the city which causes most of the problems of traffic stalling and noise created with it. This city should concentrate on fixing the problems we have now by correcting the infrastructure to handle our current problems before we add additional problems. This area is not in any way ready nor will be until the Traffic circulation is corrected.

Regards,

Dave Hamilton
1664 Del Mar Rd
Oceanside, CA 92057

Robert Dmohowski

From: denney miller <sanden7@sbcglobal.net>
Sent: Tuesday, January 30, 2018 8:02 AM
To: Robert Dmohowski; sanden miller
Subject: North River Farms Project EIR

Follow Up Flag: Follow up
Flag Status: Flagged

January 30, 2018

Mr. Robert Dmohowski
City of Oceanside

Dear Mr. Dmohowski

We are 20 year residents of Oceanside. Standing first among our concerns on the North River Farms Project is the Cumulative Effect on the Environment.

When the agricultural zoned land in Morro Hills is developed at the density projected for North River Farms, the residents of Oceanside will have to pay dearly on so many fronts forever for that incursion. This is not just one isolated project; it will surely lead to many more.

At the proposed density, it is estimated that more than 10,000 dwellings will be built in the future on Morro Hills agricultural land. The cumulative impacts to the Environment of our City and our Planet will be devastating in so many respects.

The developers will pay required fees up front, and then depart with their profits.

The residents of Oceanside will be left to pay forever to attempt to mitigate the permanent disastrous results to the Environment.

Thank you for your diligent professional efforts on The North River Farms EIR for the benefit of our city and Oceanside's residents present and future.

We cannot underestimate the great and lasting importance of the environmental impacts on this proposal. It is critical that we now make the right decisions for the best future outcome for our City and her residents.

Sincerely, Denney and Sandy Miller, 6105 Las Tunas Drive, Oceanside

DENNIS MARTINEK, Ph.D.
1537 Sleeping Indian Road

Fallbrook, California 92028

January 20, 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.

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.
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.
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.

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

Dennis Martinek, Ph.D.

January 30, 2018

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

Subject: Proposed North River Farms Development – Public Scoping Letter

I have previously submitted preliminary comments on the project both in writing and by speaking at the two public scoping meetings. Therefore, I will not repeat those comments in any detail herein.

I appreciate the opportunity to have met with Ms. Hammond (applicant representative) and you and Russ Cunningham of the City Development Services Department, Monday January 22, 2017 along with a few other representatives from my neighborhood in Morro Hills, Oceanside. The purpose of that meeting was to discuss the alternative screening process for the EIR. It is my understanding from that meeting as well as the last public scoping meeting on January 16, 2017 that the EIR will analyze at a minimum two alternatives: (1) the proposed project, and (2) an alternative based on the existing land use and zoning for the area.

At the January 22, 2017 meeting, I presented two basic alternative concepts for consideration in the EIR. Both concepts are based on consistency with the land use of the area, but include provision for mixed use development compatible with agritourism. They also limit development to outside the 100-year floodplain to reduce public safety hazards and costs for flood insurance and repairs, with the lands within the 100-year floodplain retained as agricultural land. The retained agricultural land may offset the need for additional mitigation for conversion of agricultural lands. They differ in density and overall development requirements, as follows (drawings attached).

- Concept 3 – residential would be limited to the north side of North River Road and mixed land use would be limited to the south side of North River Road. Dwelling units (DU) with 2.5 acre lots size would total 37.
- Concept 4 – this would include a transition of lot sizes between 1 and 2.5 acre with total number of dwelling units (DUs) not to exceed that allowable under the current zoning (i.e., 71 DUs). The mixed land use area is shown focused on the eastern side of the project, but could be placed differently along the south side of North River Road depending on project layout.

As discussed during the January 22, 2017 meeting, I plan to meet with additional members of our neighborhood to further develop additional alternative considerations and appreciate that we will be able to follow-up with the applicant and City Development Services Department to present additional alternative concepts, as applicable.

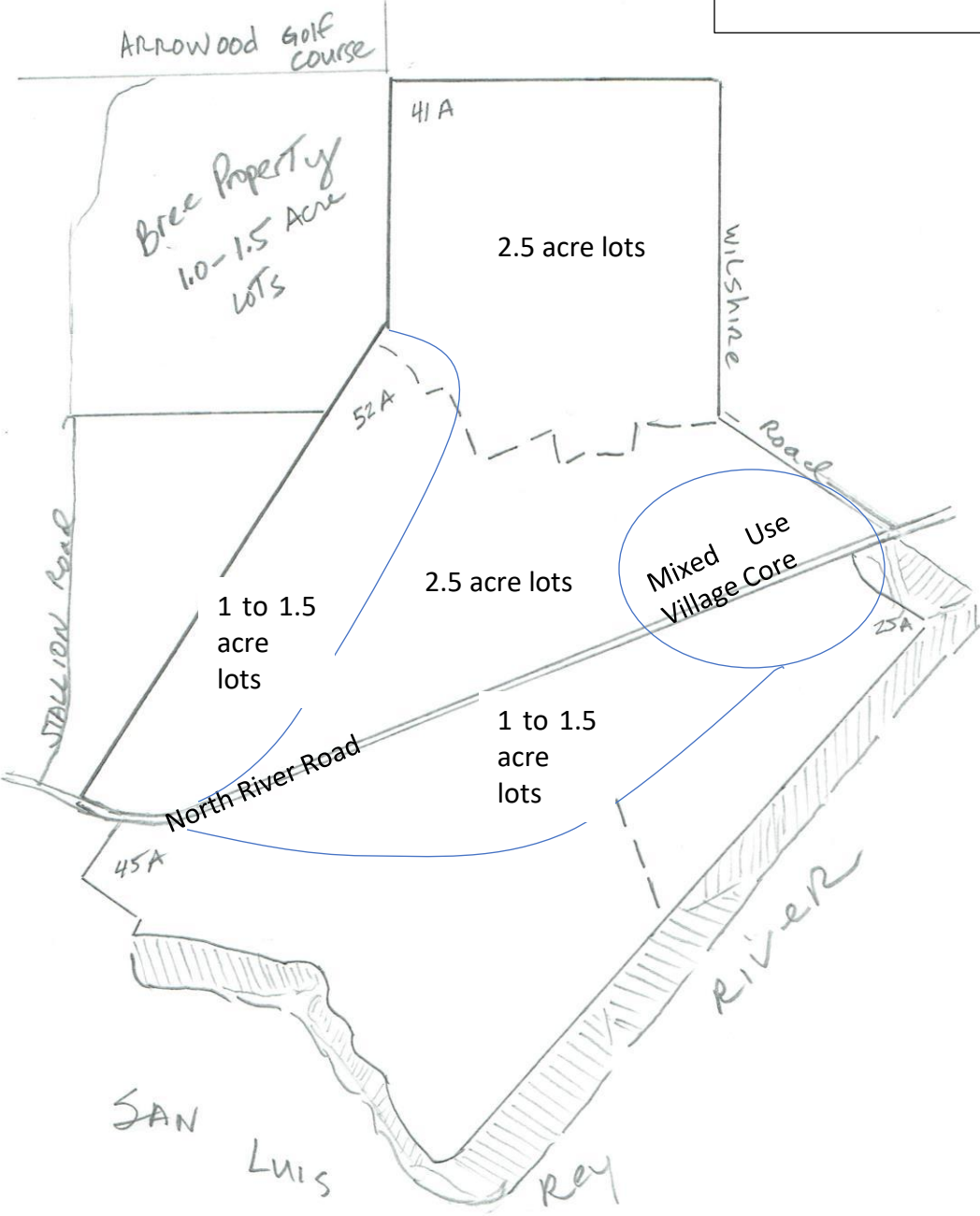
Respectfully,

Karen Green
City of Oceanside, Morro Hills Resident

Alternative Concept 3



Alternative Concept 4



January 30, 2018

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

Subject: Proposed North River Farms Development – Public Scoping Letter

We very much appreciate that the City held two public scoping meetings, with the second added due to large regional wildfire just before the first scheduled meeting.

In addition, we appreciate that the Notice of Preparation provides a comprehensive list of issue areas to be addressed in the EIR. We agree that all have the potential for significant impacts and should be evaluated: Aesthetics, Agriculture, Air Quality (including Greenhouse Gas Emissions), Biological Resources, Cultural Resources (including Tribal Cultural Resources), Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Traffic and Transportation, Utilities and Service Systems, and Energy.

The South Morro Hills Association is a California nonprofit corporation, whose membership includes property owners of the Morro Hills community within the City of Oceanside. The purpose of this organization is to further the prosperity, orderly development and preservation of our agricultural zoned community within the City of Oceanside. We are concerned that the proposed North River Farms project, which seeks amendments to the General Plan and Zoning Ordinance protections for agricultural lands, has the potential to induce future growth and urbanization of agricultural lands and loss of potential agricultural productivity to the Oceanside community.

We provide the following comments on the scope and content of the EIR organized by major topics.

Alternatives

- The CEQA process requires that a range of reasonable alternatives should be evaluated. This is especially important since the proposed project seeks amendments to the General Plan and Zoning Ordinance.
- The South Morro Hills Agitourism committee has been working with the City to identify and encourage agritourism opportunities within Morro Hills to help maintain the long-term viability of commercial farming and productivity of agricultural lands within the City.
- At a minimum, the range of alternatives should include the following considerations:
 - Alternative consistent with existing General Plan policies and zoning for the area.
 - Alternative with density compatible with total dwelling units allowed under the existing General Plan policies and mixed use compatible with agritourism objectives.

Project Description

- The NOP did not include reference to phasing plans for the proposed project. The EIR should address phasing, including the location, size, schedule and development characteristics of each phase.

- The NOP identifies 32.9 acres will be retained as agriculture; however, the proposed Development and Landscape Plans indicates that landscaped areas are included in that total. The EIR should separately quantify landscaped areas versus land that will retain the agricultural land use designation and be farmed.

Aesthetics

- The EIR should clarify that the project area is within Oceanside's Morro Hills neighborhood, which has a rural agricultural community character based on existing farmland, open space along the San Luis Rey River, and low density of homes. 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.
- 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 overlay designation of land along North River Road within the Morro Hills neighborhood should be considered in the aesthetics analysis.
- Degradation of aesthetics by night-time lighting associated with the proposed project should be addressed.
- Mitigation should focus on conserving agricultural lands and open space along North River Road.

Agricultural Land

- The proposed project would convert prime and unique farmland of local and statewide importance to urban uses. The state and local farmland designations should be mapped and quantified in the EIR.
- The EIR should clarify how the proposed farmland and community gardens would be operated and managed.
- 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 EIR should include an Agricultural Conversion Analysis technical study, including use of the California Agriculture Land Assessment and Site Assessment (LESA) model.
- 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.
- Mitigation should focus on conserving agricultural lands on a one to one ratio for each acre of developed farmland. The mitigation should occur in Oceanside, preferably within Morro Hills.

Air Quality

- Greenhouse gas (GHG) emissions are significantly less from agricultural lands compared to urban land. The EIR should quantify the increase in greenhouse gas emissions from conversion of agricultural land.
- Planning is in the final phase of the City of Oceanside Economic Development Element and Climate Action Plan for a General Plan Amendment. This study has been performed considering Morro Hills as an agricultural community in terms of assessing our economic contribution and

carbon footprint. The economic development element and carbon footprint are entirely different for dense housing tracts.

- The EIR should evaluate the project for compliance with state law and regional plans related to GHG reductions for local emissions, as well as consistency with the City's Climate Action Plan.

Biological Resources

- The Oceanside Subarea Plan is designed to promote conservation of biodiversity and ecosystem function in the City of Oceanside and the surrounding region, while allowing for continued economic development and wise land use in Oceanside. The project area is within the Agricultural Exclusion Zone identified in the City's Subarea Plan. The Agricultural Exclusion Zone allows ongoing agricultural practices as long as they do not remove existing natural habitats.
- The Subarea Plan specifies for the Agricultural Exclusion Zone that conversions to nonagricultural uses will invoke additional conservation guidelines, including preserving, restoring or enhancing upland buffers of natural vegetation adjacent to existing wetland vegetation communities. The EIR should clarify how the project addresses the agricultural conversion requirements of the Subarea Plan.
- The proposed project is adjacent to San Luis Rey River, which supports riparian and wetland habitat that supports sensitive species and diverse wildlife. The EIR analysis should address project effects from increased noise, nighttime lighting, pets and human intrusion, and how those impacts would be mitigated.
- If approved, this project is likely to result in substantial additional loss of agricultural lands within the Morro Hills area of the Subarea Plan. The analysis needs to consider cumulative impacts to biological resources from additional loss of agricultural lands and how compensatory mitigation could be accomplished within the Morro Hills area.

Cultural Resources

- Cultural resources occur within the project area. Outreach and tribal consultation should be addressed in the EIR.

Hydrology, Hazards

- The proposed project is partially within 100-year floodplain on south side of North River Road.
- The EIR should reference that North River Road has been damaged and closed during previous storm events, including extended closure after 1990s El Nino. The EIR analysis should consider flooding hazards and potential impacts to North River Road as well as to public safety from development within the 100-year floodplain.

Land Use

- SANDAG has assumed that each city in the region will comply with the provisions of the Sustainable Communities Strategy to integrate land use and transportation planning. This includes the expectation that the majority of growth in the region through 2050 will occur at 200 Smart Growth sites.
- The EIR should evaluate how the proposed project complies (or fails to comply) with the provisions of the Sustainable Communities Strategy, including proximity to a designated Smart Growth site.

- The analysis should consider how the proposed project alone and as well as cumulative growth inducing effects of the project will impact the ability of the City to comply with this regional land use plan.

Public Services, Utilities & Service Systems

- Police, Fire, Schools, Water and Sewers must have detailed studies for the entire Morro Hills area. This project in and of itself is going to demand a lot of public improvements and an increase in public services. The proposed project area is within agricultural zone where City services are limited.
- The EIR analysis should consider both the demands of the proposed project on existing public facilities and services, and how much of existing capacity would remain after development. Remaining capacity is an important consideration to future development costs.
- The EIR should include a comprehensive Fire Risk Assessment that considers proximity of development to the San Luis Rey riparian corridor, drought effects, and Santa Ana wind conditions. Cumulative effects should consider increased fire risk associated with climate change.
- The cumulative impacts to City services and systems should consider the growth inducing effects of the project on additional conversion of agricultural lands within Morro Hills.

Traffic and Transportation

- North River Road is the primary ingress and egress route used by the City's Morro Hills residents, is used by slow farm vehicles and large trucks as part of the agricultural operations, and is used as access route to Camp Pendleton by employees and off-base military personnel.
- North River Road is an emergency evacuation route for east Oceanside residents and for Bonsall and Fallbrook communities.
- North River Road is substandard for the proposed North River Farms development.
- Mitigation should address both the direct impacts of the project as well as the cumulative growth inducing impacts of the project.

Cumulative and Growth Inducing Effects

Given the substantial potential for a precedent setting land use change should the proposed project be approved, the EIR needs a comprehensive analysis of cumulative and growth inducing effects. The cumulative impact analysis consideration of future projects should not be limited to those already identified, but also consider potential future conversion of large agricultural lands within Morro Hills according to similar development standards as proposed by the North River Farms project.

Respectfully submitted,

Larry Balma

President, South Morro Hills Association

January 29, 2018

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

Subject: Proposed North River Farms Development – Public Scoping Letter

Dear Mr. Dmohowski,

I am writing you today as a concerned citizen of Oceanside and as a resident of South Morro Hills for the past three years. I am writing to share my profound objection to the North River Farms Project. My objections fall into two categories: 1) Safety, and 2) Quality of Life for Oceanside residents and beyond.

1) Safety: Fire is a real and present threat to the region that includes South Morro Hills and there are not adequate roads to evacuate residents in case of emergency. It is not only senseless to consider adding hundreds more residents and vehicles to this area, it is downright reckless.

During the recent Lilac Fire evacuation, it took my neighbor over one hour to travel three miles in a car to reach College Avenue. The roads in and out of this region were not designed to sustain so many people in the event of an emergency and the dangerous proposal to add more congestion to this neighborhood keeps me up at night. As it is, the evacuation was a harrowing experience that left permanent marks on my life. If this project is approved, I will hold those who voted for it personally responsible for the safety of this neighborhood in the event of an emergency.

North River Road and Sleeping Indian Road are also the only exit passage for emergency evacuation of the areas of Fallbrook and Bonsall, creating a public safety nightmare for evacuees if there is an increase in population in this area. This could endanger lives of the current citizens.

Another safety concern is traffic. North River Road provides the only passage for large, slow farm vehicles to transport equipment, produce, and farming materials in and out of this designated agricultural region. The addition of hundreds of homes and vehicles at the entrance to South Morro Hills on an already-dangerous road would be a disaster. Residents of normal residentially zoned areas are not likely to be tolerant of the agricultural vehicles and road blockages that can occur frequently due to normal farm activities. An increase in traffic accidents, pedestrian accidents, and road rage seems an unavoidable result of this proposal.

An additional safety concern is a traffic issue with congestion on College Avenue where the bridge crosses the riverbed at Vandegrift/North River Road. This area is incredibly congested already and increasing the residential population in this area would make it intolerable.

2) Quality of life for Oceanside residents and beyond: I've been a frequent visitor to South Morro Hills for over 12 years and relocated to this treasure of a place in early 2015. This region is a gem. It's a slice of hope for a society that has largely lost its connection with where food comes from. It's a blessed gift from those who came before us who had the wisdom to set some land aside for farming and agriculture.

It's the future. Have you noticed the huge popularity of the farm-to-table movement? Or the great resurgence of interest in farming, composting, organic food, beekeeping, and other earth-centered practices? The massive increase in interest, popularity, and profitability of farmer's markets over the past decade? The huge swell of enthusiasm for organic produce and the popularization of exotic fruits and vegetables? Have you noticed a greater quantity and diversity of organic produce in the supermarkets? The increased news and advertisements about agritourism, or vacationing in agricultural spaces like farms and wineries? There is a reason. People are waking up to the void that processed food has created in their lives and are seeking a connection with nature. They are craving vitality and nutrition and products with ingredients that they recognize. People are beginning to understand the value of soil microbes and healthy bacteria. They are seeking out opportunities to learn about and implement natural practices like backyard gardening, composting, making food from scratch, raising chickens, etc.

My point is that our modern world is moving in a direction that values nature over processed chemicals and quality over ease. Oceanside has the remarkable opportunity to capitalize on its historical inclusion of agriculture as a value and should be on the right side of history by protecting this precious land. Years from now, Oceanside can be reputed for its beautiful offerings to visitors and incomparable farm vistas. Or, it could be remembered that some who lacked vision sold out precious acreage to a wealthy developer for the profit of a few.

South Morro Hills residents are great contributors to the City of Oceanside and deserve the chance to write their own story. Members of our community have served the City of Oceanside on commissions, special projects, as volunteers, on nonprofit boards, as business owners, and we even have a grammy-award winning celebrity spokesperson touting the praises of this community. These active, engaged, passionate citizens deserve to be heard and given time to create a vision plan for this farming community before pieces of it are sold off to development, forever changing the sense and feel of the place. Developers who are not residents of Oceanside and who do not have this community's best interests at heart.

At one time, this region was filled with citrus, and when that was no longer profitable, people planted avocados. Avocados are less profitable now but farmers are creative and innovative, and they will figure out the next profitable crop. There are already exciting farming projects being tested in South Morro Hills in growing coffee and exotic fruits that have great market potential.

The land identified in the North River Farms Project proposal is not fallow land, it is actively being farmed and leased for agriculture. Re-zoning this land to remove agriculture in this area will take away jobs and productivity.

The North River Farms Project is completely transparent in it's goal to make a few people very wealthy at the sacrifice of Oceanside's history and values and a community's quality of life. Re-zoning agricultural land for the wealth of a corporate development project would be a travesty. It would also be just the beginning of a dismantling of Oceanside's long held values and commitment to local farming and agriculture, as surely more and more developers would see this as paving the way for them to chip away acre by acre. Greed taking over and forever changing a beloved landscape and community is not only tragic but short-sighted. Oceanside has the opportunity to preserve this zone and farming has never been more popular, exciting, or centered in public awareness.

As a lifelong San Diegan and hopefully an Oceanside resident for the rest of my life, I implore you to protect this community treasure that was left to us by those who came before us. Please do not approve the North River Farms project.

If you have any questions or would like to reach me, my phone number is 619-206-3473.

Sincerely,

Rachel A. Jonte
Mraz Family Farms
www.mrazfamilyfarms.org

CC:
Peter Weiss, Mayor of Oceanside
Chuck Lowery, Deputy Mayor of Oceanside
Jerome M. Kern, Councilmember, Oceanside
Esther C. Sanchez, Councilmember, Oceanside
Jack Feller, Councilmember, Oceanside

Robert Dmohowski

From: cbeautifulhomes@gmail.com on behalf of Ingrid Rothweiler
<ingrid@cbeautifulhomes.com>
Sent: Tuesday, January 30, 2018 2:58 PM
To: Robert Dmohowski
Subject: North River Ranch

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dmohowski,

Thank you for gathering Oceanside resident comments prior to considering the North River Ranch development. We moved to the eastern edge of Oceanside approximately 5 years ago due largely to the agricultural/country feeling of the area with easy access to the harbor area.

We are strongly opposed to this project for several reasons, including; traffic, noise, loss of agricultural feeling. Traffic has already dramatically increased along the 76 and will certainly do so more upon completion of homes currently being built near Rancho Del Oro/76.

We live in Marisol at Ocean Ranch. The traffic noise on N River Road is surprisingly loud in our neighborhood. Thankfully, there are not too many cars that travel this route. The addition of 700+ homes will have a dramatically negative effect on the quality of life for several neighborhoods adjacent to the river bed. The aesthetic beauty of the area would be forever changed.

Oceanside has done a remarkable job of maintaining "Old California" charm while improving the area responsibly. Please continue on this path of combining well thought out growth with integrity in maintaining the natural beauty of our area.

Respectfully and Sincerely,

The Rothweiler Family

Robert Dmohowski

From: Sally Prendergast <sallyp123@me.com>
Sent: Tuesday, January 30, 2018 4:06 PM
To: Robert Dmohowski
Cc: Alice hammond
Subject: Comments on the NOP for North River Farms Project

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Dmohowski

These comments on the NOP for the North River Farms Project are submitted on behalf of the Sierra Club North County Coastal Group (NCCG). Our Chapter has already taken a position in opposition to this project. Our project specific concerns will be discussed later in this review process. This email is limited to some specific concerns about the process and content of the EIR in response to the NOP.

The following are our comments on the NOP:

Use of Independent EIR Reviewer

The city is using what is a non- standard process for preparation of the EIR for this very complex and controversial project. This process allows the Project Applicant to prepare the EIR documents instead of an independent third party. The city is then relying on an independent third party to then review the work of the applicant. The city cannot pass on their obligations to protect the integrity of the process. We are concerned about how this will work procedurally. The developer is holding independent community meetings, as is commonly done for such a large project. But how can the developer distinguish between comments made by the public at these meetings and comments that really should be part of the NOP public record? The public does not understand the distinction, and the developer is not an independent party.

There is also a concern about how this may impact access to what should be public records. How will the city know their third party reviewer has full access to all of the records used by the developer - and not just those that support their conclusions? How is the public assured that all records are part of the public administrative record for the project? The county of San Diego claimed some of the records associated with their CAP were held by private parties and not part of the public record. That is not consistent with case law and was challenged.

GHG Mitigation

The increased GHG this project will produce must be reviewed in light of the first climate action plan (CAP) currently being prepared by the City of Oceanside. The GHG which would be produced by this project has not been included in the baseline inventory used to develop the CAP. Since the city has the obligation to reduce its' community wide GHG to meet state targets established for 2020, 2035 and 2050, a mitigation plan would need to be developed which would offset this project's increased GHG. The applicants' current mitigation plan does not. It has been reported that the plan to mitigate for the increased GHG is to purchase offsite credit in an out-of-state project. The only off site projects that could be used for mitigation must be ones that actually reduce the community wide GHG emissions in the city of Oceanside. Furthermore it must be demonstrated that any such mitigation measure is proven, quantifiable, will result in sufficient GHG mitigation in perpetuity, and the results can be monitored by the city who has responsibility for oversight of all project mitigation measures.

Kind Regards,

Sally Prendergast
Submitted on behalf of Sierra Club North County Coastal Group



Robert Dmohowski

From: Vicki Higgins <vft101@sbcglobal.net>
Sent: Tuesday, January 30, 2018 1:51 PM
To: Robert Dmohowski
Subject: north river farms planned development
Attachments: IMG_20180130_0001.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Rob,
I received the attached notification from the County of San Diego, Department of Agriculture this month. It is likely that a planned development the size of "North County Farms" will have to have at least a nursery school included if not also an elementary school. What will these new regulations do to the surrounding farming operations? I believe this will need to be seriously addressed in the EIR.

Victoria Higgins
6504 Morro Heights Road
Oceanside, CA 92057
760-758-2188
vft101@sbcglobal.net



Effective January 1, 2018:

- Regulations apply to pesticide applications made for the production of an agricultural commodity within ¼ mile of public K-12 schools and licensed child day care facilities, except family day care homes (collectively referred to as schoolsites)
- Pesticide application restrictions will apply Monday through Friday, from 6:00 a.m. to 6:00 p.m., within a specified distance of a schoolsite:
 - Two types of restriction distances: ¼ mile (1,320 feet) or 25 feet, depending on the type of application equipment used and type of pesticide applied (some application types are prohibited by labels or do not occur)

Application Equipment Type	Minimum Distance to Schoolsite by Equipment and Pesticide Type			
	Dust	Fumigant	Granule	All Other Pesticides
Airblast Sprayer	¼ mile	Prohibited	Doesn't occur	¼ mile
Aircraft	¼ mile	Prohibited	¼ mile	¼ mile
Backpack Sprayer	¼ mile	Prohibited	None	None*
Bait Station	None	Prohibited	None	None
Ground-Rig Sprayer	¼ mile	¼ mile	None	25 feet
Hand Pump Sprayer	¼ mile	¼ mile	None	None
Soil Injection	None	¼ mile	None	25 feet
Sprinkler Chemigation	Doesn't occur	¼ mile	Doesn't occur	¼ mile
All Other Equipment	¼ mile	¼ mile	None	25 feet

*Backpack sprayers that incorporate an airblast sprayer to apply "other" pesticides are prohibited within ¼ mile.

- Exceptions to application restrictions: The prohibitions do not apply if school classes are not scheduled for the day of application or the child day care facility is closed during the entire day of the application. This allows applications during the day on holidays and school breaks
- An option for an agreement between a schoolsite, property operator, and County Agricultural Commissioner with alternative application restrictions that provide the same or a greater level of protection as provided by the prohibitions
- Field fumigations within ¼ mile of a schoolsite must be completed at least 36 hours before the start of classes
- An annual notification by property operators to schoolsites and County Agricultural Commissioners by April 30 that includes contact information and a list of all pesticides expected to be used within ¼ mile of a schoolsite during July through June
 - A new grower (through purchase or lease of a field) must provide the first notification within 30 days of assuming control of the property
- CalAgPermits is the suggested method that property operators use to develop and submit the notifications

For more information contact:

County Agricultural Commissioner:
www.cdfa.ca.gov/exec/county/countymap/

Department of Pesticide Regulation:
www.cdpr.ca.gov/schoolnotify/



To : Rob Dmohowski
From: Dana Corso
Date: January 31, 2018
Re: Comments pertaining to the North River Farms Development

First and foremost, my top concerns are safety and the lack of infrastructure in South Morro Hills. This specific development is located in a flood zone and alongside San Luis Rey River bed, which also serves as a wildlife corridor. It is not maintained and remains in it's natural state, which includes lots of dry highly flammable brush. The most recent Lilac fire proved to many of the local residents and surrounding neighborhoods, that our lack of strategic evacuation plans; speaks volumes as to the IMPORTANCE of planning our future developments, in terms of the safety for our families, pets and our homes. It is critical that our safety comes first. Which means, before any zoning or land use changes take place ALL infrastructure must be updated. While it's a nice gesture that Integral wants to improve only up to their proposed development, it's unacceptable.

As you know, the City Staff, City Planners, Planning Commission, Chambers of Commerce, Alliance of Citizens To Improve Oceanside Neighborhoods (ACTION), Preserve Calavera, Council Member Sanchez, Former Mayor Wood, and the community said NO to this project. This project would result in raising the negative jobs to housing balance. High density housing in not compatible with agricultural land. This project would create sprawl and more traffic congestion, therefore creating more greenhouse gases. It conflicts with County and State objectives of reducing elements that negatively affect us.

Obviously, our current Council majority (Kern, Feller, and Lowery) disregarded the majority of Oceanside and have put their campaign donations first. We just witnessed that again with the appointment of Peter Weiss (former City Engineer, manager and consultant) who has been clearly working with the developers. Weiss will now be able to vote on the same projects. It's unbelievable! We, the citizens and staff are clearly just Cannon Fodder. So I suspect this deal is already done. I just hope and pray that the Staff will continue to say no to this irresponsible and reckless development. Given all of the proper information, it's common sense and a vote to move forward with this project is a vote to destroy lives and the quality of life for all of us here in Oceanside.

Attached are photos of the Lilac Fire and the article of the 46 horses that burned alive. Again, I hope and pray all things considered that this project is denied and the community denies the re-election of Kern, Lowery and Feller, they are Deplorable!

Very concerned about traffic impact on Fallbrook Moreno Hills roads, as a short cut to 76 + 15. Our roads are private, maintained by residents.

Compare to roads in east Vista hills being used by overflow on 78 + 15.

Name: Nancy Ruis

Date: 1-16-18

Email Address: jnrui5@gmail.com

Scoping Meeting 1.16.18

Comment:

Area is currently zoned Agriculture. Ag is rapidly shrinking in S.D. County. Any thing that can be done to save Ag acreage should be done.

When water rationing is instituted it will restrict Ag before housing.

Name: Phil Kogan

Date: Jan 16 2018

Email Address: Koganpk@gmail.com

EIR Scoping

Comment:

- 1) RESPONSIBLE DEVELOPMENT
LARGER AND LESS LOTS
- 2) LESS DENSITY ALONG RIVER
- 3) BETTER & MORE EXTENSIVE ROAD IMPROVEMENTS

Name: TOM HARRINGTON

MORENO HILLS COMMUNITY SERVICES DISTRICT

Date: 1-16-18

Email Address: THOMAS.HARRINGTON III @GMAIL.COM

Scoping Meeting 1.16.18

Comment:

Traffic is approaching capacity on N River Rd, Vandegrift and College^{Blvd} as well as Rt 76.

Why do the project? according to planning board there is minimal financial gain.

Name: Phil Kogan

Date: 1-16-18

Email Address: Koganpk@gmail.com

Scoping Meeting 1.16.18

Comment: Enviro. Impact
Noise
Traffic
Growth Inducement
Population
No due to this!

Name: Jason McDonald

Date: 1/16/18

Email Address: jasonmcdonald0804@gmail.com

I live in Fallbrook on sleeping indian
just the other side of Ocean side border.

Scoping Meeting 1.16.18

Comment: Morro hills will be impacted from North
River and Sleeping Indian. Traffic is an issue
and is one of the main arteries out. Cyclists
use these roads. Where is the water coming
from? There will be unintended consequences
to the neighborhood we live in by the large
growth and cumulative impact to
water resources, air quality and agriculture
surrounding this project. This is not the
right project for
this area

Name: Becky Tanamachi

Date: 1/16/18

Email Address: bgtanamachi@msn.com

Scoping Meeting 1.16.18

Comment: Traffic + Noise

Perform a current noise &
traffic study of 76 & College both
to assess the current noise & traffic.
I would like to see the developer

Name: do noise & traffic abatement
Fero Lewis + 76 & College

Date: 1-16-18

Email Address: ferolew@yahoo.com

Scoping Meeting 1.16.18

Comment: POSITIVE Impact on
RESIDENTS!
TRAFFIC ON 5, 15, 79,
76, NRR
VANDERKIEFF

Name: LARRY BORKER

Date: 1/16/17

Email Address: colaguy68
borker714@cox.net

Scoping Meeting 1.16.18

Comment: Project is Not located within a Smart Growth Opportunity area as identified on San Diego North County Sub-region Smart Growth Concept map.

Does not fit City's goal of 1:1 job/housing.

No significant number permanent employ-

Name: ~~Ment.~~
Phil Kogan

Date: 1-16-18

Email Address: ~~kogan~~ koganpk@gmail.com

Scoping Meeting 1.16.18

Comment:

- MITIGATION SHOULD ADDRESS BOTH THE DNE IMPACTS OF THE PROJECT AS WELL AS THE CUMULATIVE GROWTH INDUCING IMPACTS OF THE PROJECT

- MITIGATION SHOULD CONSIDER ROAD IMPROVEMENT ALONG THE ENTIRE LENGTH OF N. RIVER RD AS WE AS CREATION OF A NEW BRIDGE FROM N. RIVER RD TO HWY 76

Name:

MIKE COBAS

Date:

1-16-18

Email Address:

DIEGODAYS@aol.com

Scoping Meeting 1.16.18

Comment:

Planning board summary in Feb 2017 was against moving forward with project. Why is this changed?

Name:

Phil Kogan

Date:

1-16-18

Email Address:

koganpk@gmail.com

EIR Scoping

Comment:

Environmental + traffic issue will impact not just the immediate North River + Wilshire + Stallion attached to the plan, but also Sleeping Indian, 76, College, Vandergrift + potentially into Fallbrook

Name:

Jaime Rodriguez

Date:

1-16-18

- The agricultural, education area, market space etc is extremely small. If this plan was truly designed / had the vision to increase public awareness regarding agriculture + promote agritourism, these areas would be 2-3x their current size.
- Cannot combine open space + ag space and call it all ag space.
- Project is in a flood zone - but major flood took out North River Rd. what are all these added people going to do?

EIR Scoping

Comment:

- Only one way out of each developer area into North River Rd not a safe evacuation scenario
- North River is already heavily traveled adding 1400+ additional vehicles is not viable, either logistically or environmentally.

Name:

Jaime Rodriguez →

Date: 1-16-18

Email Address: ~~XXXXXX~~

- Can not call this an agricultural project with the amount of agricultural dedicated land used
- Wilshire is already heavily traveled w/ semis, box trucks and other vehicles conducting business w/ those businesses already in existence on Wilshire. Increasing that traffic creates additional road maintenance issues (already not regularly addressed on this area) as well as safety issues.

EIR Scoping

Comment:

A greenbelt was set aside from the top of Wilshire to the bottom on the western edge of the properties on that side of the street. It has already been minimized w/ houses at the top, golf course in the center + now house at the bottom? It goes against what most of us brought into originally when we brought property

Name:

Jamend Arizuez

Date:

1-18-18

Email Address:

- Don't see where the biological study results have been taken into consideration, other than to create "ag use" in those areas.
- Current fire station won't be able to efficiently handle the additional people and houses.
- Plan despite what it claims does not "blend" into the area due to the density requested.
- Bottom line - This project does not nor should it be approved w/ the current density and as space listed

EIR Scoping

Comment: TRAFFIC

With the proposed housing density, there will be an additional 2000-4000 cars in this area. The infrastructure will not support this additional load. Vandergrift & College Avenues ~~will~~ will become gridlocked every morning & afternoon.

Name: Glenn Knosp

Date: 12-13-17

Knosp@aol.com

This is unacceptable

EIR Scoping

Comment:

Emergency Evacuation Route. I see nothing on the plans to widen N. River Rd. How will schools/districts be impacted? Impact to traffic on N. River Rd.

Name: BRETT D. BROWN, SR.

Date: 13 DEC 2017

EIR Scoping

Comment:

- Traffic at North River/Vandergrift
- Bridge from N. River to 76???
- Emergency evacuation exit needed
- School impact. Middle School. New high school.

Name: Doug West

Date: 12/13/17

Email Address: Doug@Dougwestgroup.com

EIR Scoping

Comment: TRAFFIC

The traffic caused by the housing density is going to be horrible - it is awful now, with rush hour (am & pm) traffic at Vandergrift, turning on college to get to the 76. North River Road should also be widened because of the hazards to school children. Less housing will equal a more gentle environmental impact. Please consider a reduction in number of homes constructed.

Name:

Roxanne Knosp

Date: 12-13-17

Email Address: Knosp@aol.com

Please inform me of future meetings

EIR Scoping

Comment:

Is there going to be a designated space for community gardens? If so, where? How accessed

Name: Lisa Hamilton

Date: 12/13/17

Email Address: skilisa@hotmail.com

EIR Scoping

Comment:

Prime farm land will be lost if project is allowed, Will LESA analysis be performed?

Name: DENNIS Martinek

Date: 12-12-17

Email Address: dmartinek@palomar.edu

EIR Scoping

Comment:

IT TOOK 2 HOURS STOPPED IN TRAFFIC ON DOUGLAS TO THE 76 FROM ARROWOOD SUBDIVISION, WHEN WE WERE EVACUATING. THE FIRE AT THAT TIME WAS 2 1/2 MILES AWAY ON THE RIDGE BEHIND THE SUBDIVISION. IF THE FIRE MOVED QUICKLY WE WOULD HAVE BURNED IN OUR CARS. WE DON'T NEED MORE CARS ON OUR ROADS.

Name: Terry McEwan

Date: 12/13/17.

EIR Scoping

Comment:

Account for flood zone Traffic Green house Gas H2O, Loss of green space 3 can overrule 100,000?

Name: Sydne Ineke

Date: Dec 13, 2017

Email Address: swfski@sydne@yahoo.com

Comment:

Keep this land as farmland.
Traffic will increase.
Do not approve this.

Name: Maya Pokletar

Date: 2017-12-13

Email Address: fayelandscapes@gmail.com

EIR Scoping

Comment:

WHERE is Guest parking?
NO PARKING IS SHOWN except
in Village Core area. That would be
across busy (and increasingly busier
N River Rd) to access the N Village and
Hilltop Village park + recreation areas

Name: LISA HAMILTON

Date: 12/13/17

EIR Scoping

Comment:

VERY CONCERNED with
traffic impact. Evacuation was
a nightmare - Had 700+ homes
will make it impossible.

Name: DIANA CARNEY

Date: 12/13/17

Email Address: dianarue@gmail.com

EIR Scoping

Comment:

How will project protect
homeowners fire safety?

Name: J Marshall

Date: 12/13/17

Email Address: on sign in sheet

EIR Scoping

Comment:

ARE THERE PLANS TO WIDEN
N. RIVER RD TO ACCOMMODATE
THE EXTRA TRAFFIC?

DEREK McEANN.

Name:

Date:

EIR Scoping

Comment:

Public Parking around Parks?
Public Access to River bottom?
Existing Zoning Acreage for AG + SP
MARS / How much where AG
Will there be CZ zoning to cap density (over)
Name: Joan Johnson
Date: 12/13/20

EIR Scoping

Comment:

Why was Camp Pendleton GATES
Not opened for evacuation?

Name: Patrick Thurman

Date: 12-13-17

Email Address: Patrickthurman53@gmail.com

Who will maintain
Ag, Parks, slopes?
CALTRANS needs to
assess impacts on 76.
& make mitigations
that developers pay.

12/7/2017

Wwm173

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

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

SUBJECT: Notice of Preparation for North River Farms EIR

As a concerned citizen of Oceanside and a long-time resident of South Morro Hills I have the following comments and questions about the subject EIR.

It is well understood that the environmental impact of individual events are often compounded and increased when they are considered together. The cumulative impacts from individually minor but collectively significant projects taking place over a period of time can be devastating to the environment we are trying to protect, not just for us but for future generations.

I assume that you will require that the NRF applicants provide analysis of the cumulative and indirect impacts of this project as required by CEQA Section 15130. I am particularly interested in the analysis of irreversible environmental changes that will result from this project. The loss of farmland within Oceanside, as an example, is a significant issue and does not lend itself to traditional mitigation approaches. History shows us that after the farm land is gone, it never comes back.

Please advise the methodology that will be used to analyze the cumulative impact of this project and provide a list of the cumulative impacts that will be considered. I would expect that such list will include all of the past, present, and probable future projects that will or may contribute to the cumulative impact.

Thank you for providing the information I have requested.


William W. McDowell

Wmcd01@sbcglobal.net

13-12-17

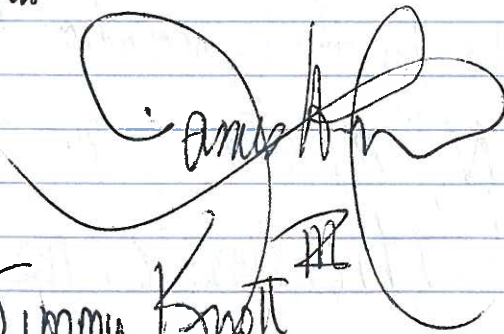
The Following Issues
were not addressed by
the Public, I held an earlier Junction
& arrived Late.

- 1) Current Status Photos/Maps
Not displayed for Comparison/contrast
- 2) The Psychological Impact of
Removal of Vacant Land
- 3) Impact on Steelhead Trout -
As the current land acts as a pre
filter for the Surrounding Community
- 4) No mention of the Impact of
the 1916 flood on the area &
Risk
- 5) No mention of the increased
Earthquake (7.4) & Tsunami
Risk - Cascade effect
- 6) Ag lands according to docs from (DWR)
the Fed's, are to be kept for

Emergency Supplies of
City & if used, replaced
City signed this back in
the 50's + 60's

7) No Mention of Impact on
Public Supps. - Water, Sewer,
gas, electric

8) No Discussion of the Public's
Role in Land & Water
Rights


Jimmy Knott
JK3@Cox.NET

December 13, 2017

Joan Johnson Comments P1 of 2

**RE: NOTICE OF PREPARATION OF AN EIR & THE REZONING FOR NORTH RIVER FARMS
PLANNED DEVELOPMENT PLAN (OCEANSIDE, CA)**

**FOR: MR. MAYOR AND THE OCEANSIDE CITY COUNCIL MEMBERS,
DEVELOPMENT SERVICES DEPARTMENT, AND DEC.13, 2017 PUBLIC EIR SCOPING MEETING**

TO: CITY OF OCEANSIDE, CA LEAD AGENCY

**THE FOLLOWING ARE COMMENTS/ REQUESTS FOR INCLUSIONS/ CITY RESPONSES/ & ENVIRONMENTAL
MITIGATIONS FOR THE PREPARATION OF THE EIR & REZONING FOR THE ABOVE DEVELOPMENT PLAN:**

A. ADEQUATELY DESCRIBE THE PROJECT'S LOCATION/ SURROUNDING DENSITY:

BE SURE TO INCLUDE THE 1,000 ARROWOOD HOMES AND THE NUMBER OF HOMES ALONG/ OFF PAPPAGALLO ROAD JUST NORTH OF ARROWOOD...NOT JUST SAY THERE IS A GOLF COURSE AT ARROWOOD. THE DWELLING UNIT DENSITY PICTURE CHANGES DRAMATICALLY WHEN THESE HOUSING AREAS ARE INCLUDED IN THE PROJECT DESCRIPTION.

**B. PROVIDE ADDITIONAL LAND USE /ZONING MAP ATTACHMENTS SO THAT PROPER ENVIRONMENTAL
ASSESSMENT CAN BE MADE:**

1. THE PROPERTY HAS A LAND USE DESIGNATION OF AGRICULTURE (A) AND IS CURRENTLY ZONED AGRICULTURE(A) WITH A SCENIC PARK (SP) OVERLAY ON THE SOUTH SIDE OF NORTH RIVER ROAD.
 - a. HOW MANY ACRES IS THE SCENIC PARK (SP) & WHERE IS IT? PROVIDE A SITE MAP SHOWING IT AND THE GENERAL PLAN MAP (SHOWING ALL THE OCEANSIDE PARK/RECREATION AREAS).
 - b. PROVIDE CHARTS TO:
 1. COMPARE ACREAGE OF OCEANSIDE PARKS INC THE SP ZONING DESIGNATION
 2. WHAT PERCENTAGE IS THIS SP ZONE IN COMPARISON TO ALL PARKS/ AREA PARKS
 - c. LIST THE GENERAL PLAN POLICIES THAT JUSTIFY/DO NOT JUSTIFY THE LOSS OF THE PARK USE
 - d. STATE HOW THE CITY WILL REPLACE THIS SCENIC PARK ACREAGE

C. SHOW ON A CHART :

THE ACTUAL ACREAGE OF THE SP ZONING ACREAGE TO;

1. TABLE ONE: OPEN SPACE/ RECREATION PA 1 (4.2 ACRES) PLUS PA2 1.4 ACRES =TOTAL 5.6 ACRES

2. FIGURE 3/ LAND USE PLAN WHICH SHOWS THE PERTINENT AREA AS OPEN SPACE/ SLOPE WHAT HAPPENED TO RECREATION USES? IT IS DIFFICULT TO USE SLOPES IN THE FOOTHILLS OR RIVERSIDE AREA FOR RECREATION.

**D. DISCUSS FIRE & OTHER EMERGENCY SAFETY VERSUS INADEQUATE STREET CAPACITY TO HANDLE
EMERGENCY EVACUATIONS**

1. LIST THE VEHICLE TRIPS PER PROJECT'S LAND USE DENSITY /TRIP GENERATION VS. STREET CAPACITY 7 INCLUDE PEAK TIME TRAFFIC GENERATION
THE AREA STREETS: N. RIVER ROAD, COLLEGE, VANDEGRIFT, DOUGLAS AND 76 ARE NOW INADEQUATE AND ARE ROUTINELY CONGESTED.

**D.2. SPECIFY MITIGATIONS TO:REDUCE: TRAFFIC CONGESTION AND
AIR QUALITY POLUTION FROM VEHICLE EMISSIONS**

E.COMMENTS;

1. THE DECEMBER 7, 2017 LILAC FIRE EVENT;

STREETS IN THE PROJECT'S AREA ARE ROUTINELY CONGESTED AND OFTEN GRID LOCKED. BEFORE YOU INCREASE DENSITY IN THE AREA, SOMETHING NEEDS TO BE DONE TO INCREASE STREET CAPACITY ON NORTH RIVER ROAD, VANDEGRIFT, COLLEGE, 76 AND DOUGLAS. IT TOOK ARROWOOD NEIGHBORS FLEEING DURING A MANDATORY LILAC FIRE EVACUATION 2.5 HOURS TO TRAVERSE DOUGLAS BETWEEN VANDEGRIFT AND 76, A 4 -LANE,3 MILE STRETCH OF ROAD.

THIS IS IMPORTANT BECAUSE NORTH RIVER ROAD, VANDEGRIFT, COLLEGE & 76 CONTRIBUTED TO THE DELAYS ON DOUGLAS. PERMITTING ANOTHER 983 , OR WORSE YET ALMOST 2,000 HOMES IN THE AREA, WOULD BE A CATASTROPHIC SAFETY DECISION FOR CURRENT RESIDENTS FLEEING WILDFIRE CONFLAGRATIONS IN THE FUTURE (THE NEW NORMAL). FOOTHILL AG LAND WITH INADEQUATE CAPACITY COLLECTOR ROADS IS A DANGEROUS PLACE FOR THIS MUCH DENSITY ...ESPECIALLY AS, ACCORDING TO CAL FIRE THE SAN LOUIS REY RIVER BOTTOM ADJACENT TO THIS PROJECT, ACTS LIKE A CHIMNEY EFFECT BLASTING WILD LAND FIRES FROM THE INLAND AND MOUNTAIN AREAS STRAIGHT TO THE OCEAN AND ALL WE CAN DO IS GET OUT OF THE WAY. TELL US HOW?

FOR ALL OF THE ABOVE MENTIONED ITEMS, I AM IN OPPOSITION TO THE REZONING AND DO NOT SEE HOW YOU CAN MAKE ALL THE MITIGATIONS NECESSARY TO TO RESOLVE ALL THE ISSUES INCLUDING ADEQUATE WATER RESOURCES AND SEWER TREATMENT CAPACITY.

SINCERELY,

JOAN JOHNSON
OCEANSIDE ,CALIFORNIA 92057



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

December 20, 2017

File Number 3300300

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

MEMBER AGENCIES

- Cities of*
- Carlsbad*
- Chula Vista*
- Coronado*
- Del Mar*
- El Cajon*
- Encinitas*
- Escondido*
- Imperial Beach*
- La Mesa*
- Lemon Grove*
- National City*
- Oceanside*
- Poway*
- San Diego*
- San Marcos*
- Santee*
- Solana Beach*
- Vista*
- and*
- County of San Diego*

ADVISORY MEMBERS

- Imperial County*
- California Department of Transportation*
- Metropolitan Transit System*
- North County Transit District*
- United States Department of Defense*
- San Diego Unified Port District*
- San Diego County Water Authority*
- Southern California Tribal Chairmen's Association*
- Mexico*

Dear Mr. Dmohowski:

SUBJECT: The City of Oceanside's North River Farms Planned Development Plan Notice of Preparation

Thank you for the opportunity to comment on the City of Oceanside's North River Farms Planned Development Plan Notice of Preparation (NOP). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (Regional Plan). These policies will help provide more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. The SANDAG comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

Smart Growth

Although the proposed project is not located in a Smart Growth Opportunity Area (SGOA) on the SANDAG Smart Growth Concept Map, SANDAG commends the City for including a "Village Core" in the Land Use Plan map. The City should provide opportunities for walking, biking, and transit in the Village Core so that residents and visitors have transportation options in the new development.

Additionally, the project is located near the San Luis Rey Transit Center, which is a potential SGOA (OC-8) for a Community Center with existing high-frequency local buses. The project should include connections and transportation amenities like bike routes, sidewalks, or shuttle service, so that future residents and visitors can access the Transit Center. The connections would reduce the need for single occupancy vehicle trips and help implement the Regional Plan.

Farmland

The Regional Plan includes a Strategy for Sustainability that proposes measures to make the San Diego region more environmentally sustainable. One of the five strategies to move toward sustainability is to protect the environment by preserving farmland. As this project is proposed primarily on farmland (potentially including Prime Farmland, Farmland of Statewide Importance, and Unique Farmland), SANDAG encourages the City to preserve the maximum

amount of farmland in this development. Additionally, any significant impacts on agricultural resources should be mitigated to the extent feasible. These measures will lead to greater sustainability in the region and help implement the Regional Plan.

San Diego Regional Bike Plan

A portion of the North River Farms project site is adjacent to the San Luis Rey River Trail, which is identified in the Regional Bike Network. This trail will establish a connection between the Coastal Rail Trail and the Interstate 15 Bikeway. Please coordinate with SANDAG to ensure that implementation of these bike projects is not hindered by the development associated with the North River Farms project.

Transportation Demand Management

Please consider incorporating Transportation Demand Management (TDM) strategies when developing the Environmental Impact Report for the North River Farms Planned Development Plan to help mitigate potential traffic impacts associated with land use changes and new development. TDM consists of programs, services, and policies that encourage the use of transportation alternatives and align with the City's commitment to reducing single occupancy vehicle trips, as outlined in the City of Oceanside's General Plan Circulation Element. Specific TDM measures to consider include:

- Provision of safe bicycle and pedestrian facilities that provide seamless connections to bikeways, schools, and proximate community destinations
- Provision of secure and convenient bike parking and amenities (such as bicycle repair stands, showers, and changing rooms) throughout the development, such as the community recreational areas, retail shops, and education pavilion
- Active promotion of carpooling and vanpooling to residents and employees. The SANDAG Regional Vanpool Program provides a subsidy of up to \$400 per month for eligible vans
- Provision of dedicated space or funding for a Park & Ride facility, given the proximity to State Route 76

The SANDAG TDM program, iCommute, can assist with promoting rideshare options as well as other regional services that encourage the use of transportation alternatives and reduce traffic congestion. Regional TDM programs include multimodal trip planning, the Guaranteed Ride Home service, and support for bicycling. Information on the SANDAG TDM program can be accessed through www.iCommuteSD.com.

Other Considerations

SANDAG has a number of resources that can be used for additional information or clarification on TDM, Smart Growth, or the Regional Bike Plan. These resources can be found on our website at www.sandag.org/igr:

- SANDAG Regional Parking Management Toolbox
- Riding to 2050, the San Diego Regional Bike Plan

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

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

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the City of Oceanside's North River Farms Planned Development Plan NOP. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SLI/KHE/kwa



San Diego County Archaeological Society, Inc.

Environmental Review Committee

16 December 2017

To: Mr. Rob Dmohowski, Associate Planner
Development Services Department
City of Oceanside
300 North Coast Boulevard
Oceanside, California 92054

Subject: Notice of Preparation of a Draft Environmental Impact Report
North River Farms Planned Development Plan

Dear Mr. Dmohowski:

Thank you for the Notice of Preparation for the subject project, which was received by this Society last month.

We are pleased that cultural resources have been included in the list of subject areas to be addressed in the DEIR. In order to permit us to review the cultural resources aspects of the project, please include us in the distribution of the DEIR when it becomes available for public review. Also, in order to facilitate our review, we would appreciate being provided with one copy of the cultural resources technical report(s) along with the DEIR.

SDCAS appreciates being included in the environmental review process for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Royle, Jr.", is written over the typed name.

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

cc: SDCAS President
File