Final Environmental Impact Report

Guajome Lake Homes Project

JUNE 2025

Prepared for:

CITY OF OCEANSIDE
300 N. Coast Highway
Oceanside, California 92054
Contact: Robert Dmohowski

Prepared by:

DUDEK

605 Third Street
Encinitas, California 92024

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B Revised Appendix A (CalEEMod Output Files) of Appendix B (Air Quality and Greenhouse Gas Emissions Analysis Technical Report)

C Revised Appendix B (Construction Noise Modeling Inputs and Outputs) of Appendix J (Noise Technical Report)

D Revised Attachment D (Prohibited Plant List) of Appendix O (Fire Protection Plan Letter Report)

E O3a: Preserve Calavera Comments on Guajome Lake Homes DEIR (January 2025) O3b: City of Oceanside Housing Element Table 22 (May 2023) O3c: San Diego County RHNA Report on Oceanside (July 2024)

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1 Introduction

In accordance with the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15088, the City of Oceanside, as the lead agency, has evaluated the comments received on the proposed Guajome Lake Homes Project (project) Draft Environmental Impact Report (Draft EIR). The Draft EIR for the proposed project was distributed to potential responsible and trustee agencies, interested groups, and organizations. The Draft EIR was made available for public review and comment for a period of 45 days. The public review period for the Draft EIR established by the CEQA Guidelines commenced on November 20, 2024, and ended on January 10, 2025.

The Final EIR consists of the following components:

- Section 1.0 – Introduction
- Section 2.0 – Response to Comments
- Section 3.0 – Errata
- Section 4.0 – Mitigation Monitoring and Reporting Program
- Section 5.0 – References

Due to its length, the text of the Draft EIR is not included with this document; however, it is included by reference in this Final EIR. None of the corrections or clarifications to the Draft EIR identified in this document constitutes "significant new information" pursuant to CEQA Guidelines Section 15088.5. As a result, recirculation of the Draft EIR is not required

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2 Responses to Comments

The Draft EIR for the Guajome Lake Homes project (project or proposed project) was circulated for public review from November 20, 2024, through January 10, 2025, in accordance with Section 15105(a) of the California Environmental Quality Act (CEQA) Guidelines. A total of 37 written comment letters were received on the Draft EIR from agencies, organizations, and individuals, as shown in Table 1. Each of the written comment letters have been assigned an alphanumeric label, and the individual comments within each written comment letter are bracketed and numbered. For example, Comment Letter A1 contains comments numbered A1-1 through A1-5.

The responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Pursuant to Section 15088(a) of the CEQA Guidelines, the City of Oceanside (City), as lead agency, is not required to respond to all comments received on the Draft EIR, but only those comments that raise significant environmental issues. In accordance with CEQA Guidelines Sections 15088 and 15204, the City has independently evaluated the comments and prepared the attached written responses to any significant environmental issues raised.

Table 1. Comment Letters and Commenters

Comment Letter	Commenter	Date Received
Agency		
A-1	California Department of Toxic Substances Control	January 7, 2025
A-2	County of San Diego	January 8, 2025
A-3	California Department of Fish and Wildlife	January 10, 2025
Individuals		
I-1	Randy Cocking	November 29, 2024
I-2	Diane Rielly	December 27, 2024
I-3	Mari Imaeda	December 31, 2024
I-4	Thomas Kounnas	January 4, 2025
I-5	Stephanie Briones	January 6, 2025
I-6	Rick Winfrey	January 6, 2025
I-7	Dr. Michael Tehhover	January 7, 2025
I-8	Colleen Balch	January 7, 2025
I-9	Audrey Schauble	January 7, 2025
I-10	Diane Rielly 2	January 8, 2025
I-11	Ann Palmisano	January 8, 2025
I-12	Macie Mathewson	January 8, 2025
I-13	Kenneth Weaver	January 9, 2025
I-14	Doreen Stadtlander	January 9, 2025
I-15	Susan Liebes	January 10, 2025
I-16	Denise Carrillo	January 10, 2025
I-17	Janice Jones	January 10, 2025
I-18	Patte Hughes	January 10, 2025
I-18	Christina Goorchenko	January 10, 2025
I-20	Diane Hawkins	January 10, 2025

Table 1. Comment Letters and Commenters

Comment Letter	Commenter	Date Received
I-21	Debbie Mastro	January 10, 2025
I-22	Michelle K	January 10, 2025
I-23	Ann Landon	January 10, 2025
I-24	Ursula Sack	January 10, 2025
I-25	Diane Rachels	January 10, 2025
I-26	Lee Kelly Gillen	January 10, 2025
I-27	Jennifer Jacobs	January 10, 2025
I-28	Tawny Oland	January 10, 2025
Organizations		
O-1	San Diego County Archaeological Society, Inc.	January 4, 2025
O-2	Preserve Calavera	January 9, 2025
O-3	Sierra Club North County Coastal Group (attachments to this letter are included as Attachment O-3 of this Final EIR)	January 10, 2025
O-4	San Diego Audubon Bird Alliance	January 10, 2025
O-5	McDonald Law Firm	January 10, 2025
O-6	Buena Vista Audubon Society	January 10, 2025

Comment Letter A1

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

January 07, 2025

Robert Dmohowski
Principal Planner
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054
rdmohowski@oceansideca.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GUAJOME LAKE HOMES DATED NOVEMBER 19, 2024, STATE CLEARINGHOUSE NUMBER 2022110028

Dear Robert Dmohowski,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the Guajome Lake Homes project (project). The proposed project would involve a request for approval of a development plan, tentative map, and density bonus to allow for the construction of 83 single-family homes on approximately 9.86 acres of the 16.78-acre project site. The project would also include approximately 35,151 square feet of private recreational and amenity area within the center of the development, featuring common open space with lawn areas, a play area, and culinary lounge. Four of the proposed 83 single-family homes (5% of the total) would be designated as deed-restricted affordable housing. The remaining 79 homes would be sold at market rate. The average proposed lot sizes would be approximately 3,200 square feet, with homes ranging in size from 1,869 to 2,220 square feet. All homes would be developed on the southern portion of the project site, which has been previously disturbed and graded. The project would avoid the northernmost portion of the project site along the riparian corridor, preserving approximately 6.92 acres of the

A1-1

16.78-acre project site as open space. In existing conditions, the project site is mostly vacant and previously disturbed, with one existing residential structure in the northern portion of the property. The existing residence is a single-family structure that would be removed with implementation of the proposed development. DTSC recommends and requests consideration of the following comments:

A1-1 Cont.

1. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.

A1-2

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in PEA Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

A1-3

3. Section 4.8.4 Impact Analysis, b) of the DEIR states: "The Oceanside Fire Department enforces City, state, and federal hazardous materials regulations for the City. City regulations include spill mitigation and the containment and securing of hazardous materials containers to prevent spills." The Oceanside Fire Department is not a self-certified local agency therefore DTSC

A1-4

recommends the City of Oceanside receive oversight from a self-certified local agency such as the San Diego County Department of Environmental Health & Quality.

A1-4 Cont.

DTSC appreciates the opportunity to comment on the MND for the Guajome Lake Homes project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via email for additional guidance.

A1-5

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Vanessa Scheidel
Environmental Planner
Dudek
vscheidel@dudek.com

Jonathan Frankel
Vice President, Forward Planning
Rincon Homes
jfrankel@rincongrp.com

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

Response to Comment Letter A1

Agency
Department of Toxic Substances Control
January 7, 2025

A1-1 The commenter provides a summary of the proposed project description and introductory remarks on comments provided in the letter. Please refer to Responses to Comments A1-2 through A1-4 below.

A1-2 The commenter requests that, prior to demolition of any buildings or other structures on the project site, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned hazardous building materials should be conducted in compliance with California environmental regulations and policies. The comment also states that sampling near current and/or former buildings should be conducted in accordance with the Department of Toxic Substances Control (DTSC) Preliminary Endangerment Assessment (PEA) Guidance Manual.

As discussed in Section 4.8, Hazards and Hazardous Materials, of the Draft EIR, the project would comply with all applicable requirements such as California Occupational Safety and Health requirements, the Hazardous Waste Control Act, California Accidental Release Prevention program, and the California Health and Safety Code, including during demolition activities, which would ensure potential impacts related to the release of hazardous materials due to project implementation would be less than significant (Draft EIR, p. 4.8-9). For clarity, specific regulatory requirements have been added to the State Regulations of the Regulatory Setting of Section 4.8, Hazards and Hazardous Materials in the Draft EIR, along with discussion that the project would adhere to these requirements in undertaking demolition, removal, and disposal of the existing onsite structure. Revisions are shown in ~~strikeout~~/underline for Section 4.8, Hazards and Hazardous Materials, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR). Impacts would remain less than significant through compliance with these regulations and policies.

A1-3 This comment identifies DTSC's recommendations for testing and assessing all imported soil and fill material prior to arriving on the site. The commenter references the methods and screening levels outlined in DTSC's PEA Guidance Manual. As described in Chapter 3, Project Description, of the Draft EIR, the project would result in a next export of earthwork material to balance the project site as there would be approximately 17,500 cubic yards earthwork material needed for fill and 84,500 cubic yards of earthwork material that would need to be cut or removed. Therefore, the project is not anticipated to require the import of any soils or other fill material during on-site project construction. Furthermore, as described in Section 4.8, Hazards and Hazardous Materials, the project would adhere to all existing federal and state standards in place for the use, handling, storage, and transport of any materials brought onto the site during construction of the project (Draft EIR, p. 4.8-9). The project contractor would source imported soils in accordance with all geotechnical standards and requirements as well as standard construction practices for obtaining clean fill soils. Compliance and adherence to these standards would ensure that impacts are less than significant and it would be speculative to assume otherwise that contaminated soils would be brought onto the project site. The guidance provided in the comment is noted and the project's contractor would be informed of DTSC's "Information Advisory Clean Imported Fill Material Fact Sheet." This comment is noted for the administrative record and

included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the project. No further response is required.

A1-4 The comment clarifies the role of the Oceanside Fire Department (OFD) in enforcing hazardous materials regulations. Section 4.8, Hazards and Hazardous Materials, of the Draft EIR has been updated to clarify the City of Oceanside receives oversight from the San Diego County Department of Environmental Health & Quality rather than the OFD. Revisions to Draft EIR Section 4.8, Hazards and Hazardous Materials, are shown in ~~strikeout~~/underline to clarify this information and provided in Chapter 3, Errata, of the Final EIR.

A1-5 The commenter provides closing statements and provides contact details. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the project.

Comment Letter A2

County of San Diego

VINCE NICOLETTI
INTERIM DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Code Compliance
(858) 565-5920 Building Services

January 8, 2025

Rob Dmohowski, AICP
Principal Planner
City of Oceanside, Planning Division
300 North Coast Highway
Oceanside, CA 92054

Sent via email to: rdmohowski@oceansideca.org

REQUEST FOR COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE GUAJOME LAKES HOME PROJECT (PROJECT)

Dear Mr. Dmohowski,

The County of San Diego (County) staff reviewed the City of Oceanside (City) Draft Environmental Report (EIR) for the Guajome Lakes Home Project (Project), dated November 20, 2024. A2-1

County staff appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for the Project.

GENERAL

The County's Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the magnitude of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the county. Project impacts that could have potentially significant adverse effects to the unincorporated county or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: http://www.sandiegocounty.gov/pds/procguid.html. A2-2

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY (DEHQ)

The County's DEHQ Food, Water, and Housing Division (FWHD) is responsible for the protection of public health and the environment by ensuring that food facilities adhere to food handling and food handler safety standards and proper food waste disposal, that septic systems are in compliance to not contaminate groundwater, and housing standards are met for the health of the A2-3

public. The FWHD has completed its review and has the following comments regarding the Project.

A2-3 Cont.

1. Both the County's Regional Water Quality Control Board (RWQCB) approved plan for permitting on-site wastewater treatment (septic) systems and the County's implementing ordinance apply County-wide and require a 5:1 (horizontal to vertical) setback from the top of a cut slope to any existing septic system leach field or designated reserve area. The County can enforce this setback requirement where a County approval is required for a grading project, or where County approval is required for an onsite wastewater system on the lot to be graded. The County relies on cities to take this setback requirement into account when approving maps and grading projects within incorporated cities where the development project itself will be served by sewer. If this setback requirement is not applied to maps and grading projects within cities, the potential exists for percolating sewage from existing septic systems on adjacent properties to surface from a grading cut, creating a public health hazard. Any such hazard could cause DEHQ to:

   a. Condemn the property on which sewage surfaced, and
   b. Require that the property to be vacated until a repair to, or replacement of, the existing septic system on the adjacent property could be completed, if a repair was feasible.

A2-4

2. DEHQ records indicate that the adjacent property to the west/northwest of the project site, APN 157-412-20 (5497 Albright St) is served by a septic system, which is located in the southwest portion of the property. Although the precise location of the system is not documented in the DEHQ records, the approved area for the septic system leach field is 5 feet from the property line adjacent to lots 13-15. The proposed grading cut for these lots will create a septic system leach field setback that extends into the existing approved septic area. This indicates a potential risk that percolating sewage from that leach field could surface from the proposed cut.

A2-5

   DEHQ recommends that the grading plan be revised to not create a septic leach field setback onto this property unless several conditions are met as follows:

   a. The leach field should be surveyed and mapped, and a certified professional should provide an opinion as to whether the proposed grading cut could intercept percolating sewage from the leach fields. Where that risk is identified, grading plans should be revised to eliminate the risk.
   b. The developer should be required to demonstrate that the proposed grading cut would still allow a replacement leach field sized to meet current standards to be installed. Where the proposed grading would preclude a compliant replacement of a failed leach field, grading plans should be revised.
   c. The owners of the adjacent parcel should be specifically notified in writing that grading for the proposed project could impose a septic system setback restriction onto their parcel. The owner should be notified of the proposed project so they can consider participating in the public review process for tentative map approval.
   d. The developer should accept an enforceable covenant requiring written notice to each initial and subsequent purchaser of the project lots on which the proposed grading cut is made. The required written notice should state that the grading cut has imposed burdens on the adjacent landowner and may have increased the risks that percolating sewage from the adjacent parcel may surface from the grading cut on the property they own.

A2-6

3. Alternatively, the property could be connected to public sewer prior to site grading.

A2-7

4. DEHQ Land Use Program staff are available on a cost-recovery basis to assist the City in consideration of alternative grading plans for the project.

A2-8

5. DEHQ records indicate that the adjacent property to the east/southeast of the project site, APN 157-412-25 (2837 Guajome Lake Rd) is served by a septic system, which is located to the east of the driveway and south of the existing residence. Although the precise location of the system is not documented in the DEHQ records, the approved area for the septic system leach field is 5 feet from the eastern edge of the driveway adjacent to lots 36-41. The proposed grading cut for these lots may create a septic system leach field setback that extends into the existing approved septic area. This indicates a potential risk that percolating sewage from that leach field could surface from the proposed cut. To ensure that the septic system on this property is not impacted by the proposed project grading, DEHQ recommends that the grading plan be submitted to the DEHQ Land Use Program for review and concurrence prior to grading plan issuance.

A2-9

The County's DEHQ Hazardous Materials Division (HMD) is responsible for the protection of public health and the environment by ensuring hazardous materials, hazardous waste, medical waste, aboveground tanks, and underground storage tanks are properly managed. The HMD has completed its review and has the following comments regarding the Project.

1. Any and all construction/improvement-related hazardous wastes to be generated (i.e., used oil, paint waste, lead paint debris, waste materials containing asbestos) must be classified, labeled, and handled in a manner as to prevent release to the environment. Contractor(s) must ensure that hazardous wastes are properly disposed of by a California-registered hazardous waste hauler and maintain documentation of proper disposal dating back 3 years. More information on hazardous wastes can be found here: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazwaste.html

2. Depending on the nature of construction, a Hazardous Materials Plan Check review may be necessary in order for buildings to be cleared for occupancy. Similarly, if the project will create new facilities that become subject to regulation by the HMD, permits must be established for those facilities. For your reference, information regarding the Hazardous Materials Plan Check requirement can be reviewed here: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_plan_check.html

A2-10

3. CONTAMINATED SOIL: If it is discovered that any hazardous materials and or waste have been released to the environment before or during the project, the contaminated environmental media (e.g. soil) must be removed and properly managed and disposed of. A Voluntary Assistance Project (VAP) may need to be initiated to ensure the hazardous materials/waste release has been properly cleaned up. See the HMD's VAP website for additional information: Voluntary Assistance Program (sandiegocounty.gov)

4. Anytime during construction and after completion of the Project, the HMD has the authority pursuant to state law and County Code to regulate facilities that handle or store hazardous materials, and/or generate or treat hazardous waste. The HMD will apply that authority as necessary to protect public health and the environment. Additional regulatory guidance information can be found on the County's website at: Hazardous Materials Division (sandiegocounty.gov).

DEPARTMENT OF PARKS & RECREATION (DPR)

DPR enhances the quality of life in the County by providing exceptional parks and recreation experiences and preserving significant natural resources. The proposed Project has a potential to impact County-maintained parks. The County's DPR requests coordination and additional information/reports addressing the following items: A2-11

1. Proposed housing does not impact County DPR regional trails, trail easements or trails outlined in Community Trails Master Plan. A2-12
2. Proposed housing is directly across the street from Guajome County Park and offers connection to DPR's park and trail. A2-13
    a. More details and future coordination with DPR team is needed to create legal access, crossings, signage and discuss maintenance.
3. Appendix O, Figure 4 – The fuel modification zone extends offsite to the southwest of Guajome Lakes Road onto a portion of Guajome Regional Park. Please revise fuel modification to avoid impacting County property. A2-14
4. Section 4.1.4 – The County requests that all exterior light be directed away from Guajome Regional Park. A2-15
5. Section 4.13 – The DEIR restricts its discussion of park impacts to City parks and does not provide a discussion of impacts to the County's Guajome Regional Park, located across the street from the project site. A2-16
6. Section 4.14.1 – Please note that the County operates and maintains Guajome Regional Park. A2-17
7. Staff requests that City provide parking plan to reduce impacts to park operations.
8. Please contact the following DPR staff to coordinate on the above items including regarding any project drainage related work needed on County parks property: emmet.aquino@sdcounty.ca.gov or jessica.cissel@sdcounty.ca.gov A2-18

DEPARTMENT OF PUBLIC WORKS (DPW)

DPWs Watershed Protection Program helps to ensure that our waterways are protected by preventing pollutants from entering the County's storm drain system in compliance with our Municipal Stormwater permit. Watershed has completed its review and has the following comments regarding the Project. A2-19

1. The Project must comply with the San Diego Municipal Storm Water Permit Order No. R9-2013-0001, (as amended by Order Nos. R9-2015-0001 and R9-2015-0100). The Project should consider implementing permanent Site Design, Source Control, Pollutant Control, and Hydromodification Management, in accordance with the County's Best Management Practices (BMP) Design Manual.

2. Provide and include in Project design applicable BMP (e.g., construction avoidance and minimization measures) and associated plans, for conformance with the County's Grading Ordinance, Watershed Protection Ordinance, and State of California's Construction General Permit.

A2-19 Cont.

The County appreciates the opportunity to comment on the Project. We look forward to receiving future documents related to the Project and providing additional assistance, at your request. For further coordination regarding the DEHQ comments please contact Rita Raphel, Office Support Specialist, at rita.raphael@sdcounty.ca.gov, or 619-756-5388. For further coordination regarding the DPW comments above, please contact Masha Landau, Land Use/Environmental Planner III, at masha.landau@sdcounty.ca.gov, or 619-385-7591. For further coordination regarding the DPR comments above, please contact Emmet Aquino, Park Project Manager, at emmet.aquino@sdcounty.ca.gov, or at 619-318-6929.

If you have any general questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planning Manager, at (858) 505-6677, or via e-mail at timothy.vertino@sdcounty.ca.gov.

A2-20

Sincerely,

Jennifer Kazmer

Jennifer Kazmer, Chief
Long Range Planning Division
Planning & Development Services

cc: Hunter McDonald, Policy Advisor, Board of Supervisors, District 5
Jacob Boerboom, CAO Staff Officer, LUEG
Timothy Vertino, Land Use/Environmental Planning Manager, PDS
Rita Raphael, Office Support Specialist, DEHQ
Masha Landau, Land Use/Environmental Planner, DPW
Emmet Aquino, Park Project Manager, DPR

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Response to Comment Letter A2

Agency
County of San Diego
January 8, 2025

A2-1 The comment consists of an introductory statement. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A2-2 The commenter provides San Diego County's Land Use and Environment Group Guidelines for Determining Significance of environmental impacts for projects in the unincorporated County for reference. The project site is not located within the unincorporated County. The project site is located within the City and, as such, the evaluation of land use impacts was performed in accordance with City requirements. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No further response is required.

A2-3 The commenter provides the responsibilities of the County's Food Water and Housing Division. In response, the City acknowledges this as an introductory comment. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A2-4 The commenter states that both the Regional Water Quality Control Board approved plan for permitting on-site wastewater treatment systems (OWTS) and the County's implementing ordinance apply County-wide and require a 5:1 (horizontal to vertical) setback from the top of a cut slope to any existing septic system leach field or designated reserve area. The commenter also states that if this setback requirement is not applied to maps and grading projects within cities, the potential exists for percolating sewage from existing septic systems on adjacent properties to surface from a grading cut, creating a public health hazard. The comment further states actions that Department of Environmental Health and Quality (DEHQ) can take when this happens. The project does not propose the use of septic systems. It is assumed this comment is providing introductory regulatory context for the subsequent comments. Comments regarding the adjacent property's septic system leach field are addressed in Responses to Comments A2-5 through A2-9 below.

A2-5 The commenter identifies an adjacent property—5497 Albright Street, Assessor's Parcel Number (APN) 157-412-20—located west/northwest of the project site that is served by a septic system located in the southwest portion of the adjacent property (approved area for the existing septic system leach field is 5 feet from the project site property line adjacent to lots 13 through 15) and explains that the proposed grading cut for these lots conflict with the required setbacks for a septic system leach field, a potential risk for sewage would percolate from the leach field as a result. The project applicant does not have permission to access the neighboring property however through the city's Conditions of Approval for the project, the applicant would be required to survey the project site near the existing septic system and leech field to evaluate whether the proposed grading would in fact have the potential to affect the property owners' system. In the event investigations reveal proposed grading could affect the existing septic and leach field, the grading plan and/or project design would be modified to ensure compliance with standards in coordination with the DEHQ. This could include accommodation of the 5:1 setback requirement, installation of a physical barrier to prevent percolation, and/or other measures that would

be submitted for review and approval by the DEHQ and City. Consistent with the County's implementing ordinance for RWQCB's water quality control policy for OWTS permit, the project would be required to demonstrate compliance during plan check and prior to issuance of grading permits with the City.

A2-6 The commenter recommends that the grading plan be revised to ensure a setback that will not impact the adjacent property septic leach field and outlines several conditions to meet. Please refer to Response to Comment A2-5 above for discussion as to how the project would meet required conditions related to grading near adjacent property septic leach fields.

A2-7 The commenter states the adjacent property could alternatively be connected to public sewer prior to site grading. In response, the EIR evaluates the potential for impacts from connecting the project development to existing public sewer infrastructure. Connection of adjacent properties to the public sewer system are not proposed as part of this project. As discussed in Draft EIR Chapter 3, Project Description, and Section 4.17, Utilities and Services Systems, proposed sewer facilities for the project are private.

A2-8 The commenter states DEHQ Land Use Program staff are available on a cost-recovery basis to assist the City in consideration of alternative grading plans for the project. This comment is noted. Please refer to Response to Comment A2-5 above for discussion as to how the project would meet required conditions related to grading near adjacent property septic leach fields.

A2-9 The commenter states that DEHQ records indicate another adjacent property located east/southeast of the project site (2837 Guajome Lake Road [APN 157-412-25]) is also served by a septic system with the approved area for the septic system leach field located 5 feet from the eastern edge of a driveway adjacent to the project site lots 36 through 41. The comment expresses concern that the proposed grading cut for these lots may also conflict with the required setbacks for a septic system leach field that could result in a potential risk for sewage percolation.

Based on preliminary investigations, the project design would meet the setback requirements for this property (2837 Guajome Lake Road). Regardless, the project is required to demonstrate to the City during plan check and prior to issuance of grading permits that no potential affect to adjacent existing septic systems and leach fields would occur to ensure project consistency with the County's implementing ordinance for RWQCB's water quality control policy for OWTS.

A2-10 The commenter summarizes the County's DEHQ Hazardous Materials Division (HMD) responsibilities and provides HMD's comments on the project based on their review. As discussed in Section 4.8, Hazards and Hazardous Materials, of the Draft EIR, and the Phase 1 Environmental Site Assessment (Appendix P), no recognized environmental conditions (RECs), hazardous materials, or contaminated soils have been identified onsite based on regulatory and historical research and prior soil sampling and analysis. The project would be required to comply with all applicable laws, requirements and regulations, which would ensure potential impacts related to the release of hazardous materials due to project implementation would be less than significant. For clarity, specific regulatory requirements have been added to the State Regulations of the Regulatory Setting of Section 4.8, Hazards and Hazardous Materials in the Draft EIR. Refer also to Response to Comment A1-2 above for discussion on hazardous material compliance associated with the existing structure at the project site and compliance with requirements and regulations to ensure proper demolition, removal, and disposal, and

handling of any hazardous wastes. Revisions are shown in ~~strikeout~~/underline for Section 4.8, Hazards and Hazardous Materials, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR).

A2-11 The commenter states responsibilities of the County's Department of Parks and Recreation (DPR) and states that the project has potential to impact County maintained parks. The City acknowledges the comment as an introduction to comments that follow. Please refer to Responses to Comments A2-12 through A2-18 below.

A2-12 The commenter requests justification that proposed housing does not impact County regional trails, trail easements or trails outlined in the Community Trails Master Plan. The closest County regional trail to the project site is the California Coastal Trail, approximately 7.8 miles west of the project site. The closest existing or planned community trail within the Community Trails Master Plan to the project site is planned Trail 19 within the Bonsall Community Plan, located approximately 1 mile southeast of the project site (County of San Diego 2005). The trail has not been constructed and therefore impacts to the planned trail are not discussed in this EIR. As discussed in Draft EIR Section 4.14, Recreation, while the project would increase the utilization of existing parks and recreational facilities within the City; it is determined that the combination of proposed open space amenities on site, existing park and recreational facilities in the area, and proposed future recreational facilities within the City would adequately serve future residents of the project site. In addition, the project is located entirely within the City of Oceanside and would not result in an encroachment onto Guajome Regional Park property. To clarify within the EIR that the Guajome Regional Park is owned, operated, and maintained by the County, text revisions have been made to the Draft EIR Section 4.14, Recreation, and Section 4.13, Public Services, and are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR.

A2-13 The commenter requests more details and future coordination with the County DPR team for access, crossing, signage, and maintenance because the project is proposing housing across the street from Guajome Regional Park. While the project site is across the street from Guajome Regional Park, there are two trailheads located within 0.25 mile of the project site. A sidewalk along the project frontage of Guajome Lake Road and just west of the project site to Albright Street is proposed that would improve pedestrian connectivity along this road. However, a sidewalk on the southside of Guajome Lake Road is not proposed as part of this project. With no sidewalk proposed as part of this project on the south side of Guajome Lake Road project frontage and given the close proximity of existing trail entrances to Guajome Regional Park from the project site, it would not be appropriate to propose a pedestrian crosswalk and/or a new trail connection for access to Guajome Regional Park along this segment of Guajome Lake Road. To clarify this, text revisions have been made to the Draft EIR Section 4.14, Recreation, and Section 4.13, Public Services, and are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. However, the project will be required to pay its fair share of thoroughfare and traffic fees, which are intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process. As concluded in Draft EIR Section 4.14, Recreation, while the project would increase the utilization of existing parks and recreational facilities in the project area, the combination of proposed open space amenities on site, existing park and recreational facilities in the area, and proposed future recreational facilities within the City would adequately serve future residents of the project site.

A2-14 In response, the commenter is referring to an area identified as 'offsite equivalent fuel modification area' that extends southwest of Guajome Lake Road into a portion of the Guajome Regional Park

(i.e., County maintained property). The offsite equivalent areas identified in Figure 4 of Appendix O, Fire Protection Plan Letter Report, are either currently being maintained by adjacent property owners, as required by the Oceanside Fire Department, or do not require maintenance in their current state. The project would not impact this County property.

Specifically, the offsite equivalent fuel modification area that extends southwest of Guajome Lake Road functions as defensible space for the project that does not require maintenance. This is because it consists of either the existing non-combustible Guajome Lake Road surface and/or low-growing vegetation similar to a thinning zone. Therefore, neither the project nor the County would be required to alter or conduct any fuel modification/defensible space activities – such as installing irrigation or thinning vegetation – in these areas.

Rather, these areas are shown on the Fuel Modification Plan to visually demonstrate to the Oceanside Fire Department that, through a combination of onsite fuel modification and offsite equivalent areas, the project achieves up to 100 feet of fuel modification/defensible space around the proposed perimeter structures.

A2-15 The commenter requests all exterior light to be directed away from Guajome Regional Park. Please refer to the discussion in Draft EIR Section, 4.1, Aesthetics. Lighting features would consist of energy-efficient lighting that would be fully shielded and directed downward to minimize light trespass onto surrounding properties, such that lighting would be directed away from the Park. In addition, all outdoor lighting would meet requirements outlined in Chapter 39 of the City Municipal Code (light pollution regulations) and would be shielded appropriately. Page 4.1-4 of the Draft EIR summarizes these requirements. Exterior lighting would be turned off during daylight hours. Through compliance with the City Municipal Code, proposed outdoor lighting would not substantially affect day or nighttime views (Draft EIR, p. 4.1-9). As such, the proposed outdoor lighting would be directed away from surrounding properties, including Guajome Regional park, and directed downward into the property at nighttime.

A2-16 The commenter suggests Draft EIR Section 4.13, Public Services, does not address impacts to Guajome Regional Park, located across the street from the project site. In response, Draft EIR Section 4.13, Public Services, makes several references to parks within the City, including specific references to Guajome Regional Park. This characterization is correct because the park is located within City boundaries, even though the park is owned and operated by the County. However, to clarify that the Guajome Regional Park is owned, operated, and maintained by the County, text revisions have been made to the Draft EIR Section 4.13, Public Services, and are shown in ~~strikeout~~/underline in Chapter 3, Errata, of this Final EIR.

Draft EIR Section 4.13, Public Services, concludes that while the project may increase the use of existing parks and recreational facilities in the City, the combination of proposed on-site open space and private open space, existing public park and recreational facilities in the project vicinity and proposed future recreational facilities within the City would adequately serve future residents of the project site. As discussed in Draft EIR Section 4.13, the project developer would be required to pay applicable City development and park impact fees, which contribute to parks, public facilities, and schools. In other words, the project would not require construction of new park facilities to maintain City park standards.

Regarding County regional park standards, such standards are set at 15 acres of regional parks for every 1,000 residents of the unincorporated County. The project, located in the City of Oceanside, would not impact these standards or require additional facilities.

The Draft EIR Section 4.13, Public Services, does describe impacts to parks within City boundaries. This includes Guajome Regional Park; although the park is owned and operated by the County, it is located within City boundaries. However, as discussed in Response to Comment A2-12 above, text revisions have been made to the Draft EIR Section 4.14, Recreation, to clarify that the Guajome Regional Park is owned, operated, and maintained by the County As described in Draft EIR Section 4.14, Recreation, the proposed project would house approximately 223 people. In addition to Guajome Regional Park, those residents would be able to enjoy the City's 15 community and 17 neighborhood parks, 3 recreation centers, a YMCA and a Boys and Girls Club, 2 senior centers, 5 skateparks, 2 pools, 115 acres of school play areas, and beaches. The nearest City neighborhood parks include 3-acre Spring Creek Park, located approximately 0.25 miles northeast of the project site, and 5-acre Alamosa Park, located 0.9 miles southwest of the project site. The project would include 35,151 square feet of private recreational and amenity area within the development. Additionally, each proposed residence would include a private front and rear yard. The City requires 300 square feet of open space per unit; the project would create approximately 423 square feet of open space per residence, in addition to the private open space provided for each lot. Further, the project would be required to pay the City applicable development and park impact fees, as discussed above. For these reasons, and as discussed in Section 4.14, Recreation, implementation of the project is not anticipated to result in significant impacts related to accelerated deterioration of existing parkland or recreational facilities, including Guajome Regional Park, because it is a relatively small project, it integrates proposed open space amenities on site, and existing and future parks and other recreational facilities in the City would adequately serve its future residents without overburdening the Park (Draft EIR, p. 4.14-7).

A2-17 The commenter notes that Guajome Regional Park is owned, operated and maintained by the County. In response. As discussed in Response to Comment A2-12 above, text revisions have been made to Draft EIR Section 4.14, Recreation, to clarify that the Guajome Regional Park is owned, operated, and maintained by the County, Text revisions to Draft EIR Section 4.14, Recreation, are shown in ~~strikeout~~/<u>underline</u> in Chapter 3, Errata, of this Final EIR.

A2-18 The commenter states that the County DPR is requesting a parking plan to reduce impacts to Guajome Regional Park operations. The comment provides DPR staff contacts that can assist with County comments provided by DPR and drainage-related work.

Initially, parking is generally considered a social impact, not an environmental impact that needs to be evaluated in a CEQA document. See, San Franciscans Upholding the Downtown Plan v. City & County of San Francisco (2002) 102 Cal.App.4th 656, 697 and Save our Access—San Gabriel Mountains v. Watershed Conservation Authority (2021) 68 Cal.App.5th 8, 26.

In any case, the 83-unit project would accommodate parking for its residents and guests onsite by providing two-car garages for each single-family home, which would include a full driveway for guest parking (see Draft EIR, Section 3.2.3.4, Parking). Refer to Draft EIR Section 3, Project Description, and Figure 3-3, Conceptual Site Plan.

The closest entrance to the project site is within Guajome Regional Park, located approximately 0.25 miles from the southwest corner of the project site via Guajome Lake Road. Parking is provided within the park. However, given the close proximity of the nearest entrance, the project is not anticipated to generate substantial demand for parking at Guajome Regional Park or otherwise impact parking operations at the park. Further, Guajome Regional Park has several parking lots that provide parking spaces to visitors from all over the County and the City is not aware of any parking deficit at the Guajome Regional Park. Thus, given the small size of the project, its internal plan for parking, and proximity to the park entrance, it is not anticipated that the project would adversely impact the availability of parking at the Guajome Regional Park. As concerns staff contacts, the comment is noted. No further response is required.

A2-19 The commenter summarizes the responsibilities of the County's Department of Public Works Watershed Protection Program and states that the project must comply with San Diego Municipal Storm Water Permit Order No. R9-2013-0001, (as amended by Order Nos. R9-2015-0001 and R9-2015-0100) and should consider implementing permanent Site Design, Source Control, Pollutant Control, and Hydromodification Management, in accordance with the County's Best Management Practices (BMP) Design Manual. The comment requests that these be included as a project design BMP and in associated plans for conformance with the County's Grading Ordinance, Watershed Protection Ordinance, and State of California's Construction General Permit.

In response, the proposed project would not result in any grading, new construction, or alteration of drainages within the County-owned Guajome Regional Park. Therefore, implementation of site design, source control, pollutant control, and hydromodification management, in accordance with the County's BMP Design Manual would not be applicable to the project. Similarly, the County's Grading Ordinance and Watershed Protection Ordinance would not be applicable to the project. The National Pollutant Discharge Elimination System (NPDES) State Water Resources Control Board (SWRCB) Construction General Permit is addressed in Section 4.9, Hydrology and Water Quality, Threshold a) with respect to construction impacts. The Draft EIR Section 4.9, Hydrology and Water Quality, describes that the project will comply with the San Diego Municipal Storm Water Permit Order No. R9-2013-0001 and implement pollution control and BMPs during project construction and operation. Compliance with applicable water quality and stormwater regulations and the City's BMP Design Manual would prevent pollutants from entering the regions storm drain system, in compliance with all applicable requirements of the San Diego Regional Water Quality Control Board and City of Oceanside.

Regarding construction, the Draft EIR explains the project is required to comply with the NPDES SWRCB Construction General Permit Order No. 2022-0057-DWQ for stormwater discharges and general construction activities and to incorporate runoff controls and standard BMPs, such as regular cleaning or sweeping of construction areas and impervious areas. In compliance with the Construction General Permit Order 2022-0057-DWQ, a stormwater pollution prevention plan (SWPPP) would be prepared for the project that specifies BMPs that would be implemented during construction to minimize impacts to water quality. Surface drainage during project construction would be controlled through implementation of the Storm Water Quality Management Plan (SWQMP) (Appendix I) and SWPPP and in accordance with NPDES regulations and provisions of the City's Grading and Erosion Control Ordinances.

The project's SWQMP (Appendix I) was prepared based on requirements set forth in Provision E.3 of the RWQCB's NPDES MS4 Permit that covers the San Diego Region (Order No. R9-2013-0001). The

stormwater quality design was also prepared in accordance with the City's BMP Design Manual. The Draft EIR describes the project would implement permanent source control measures, which would include prevention of illicit discharges, storm drain signage, on-site storm drain inlets, future indoor and structural pest control, and landscape/outdoor pesticide use. Two biofiltration basins are proposed on the project site to provide stormwater treatment for the pollutants discharged from the development (Appendix H, Preliminary Hydrology Study). The project would be required to provide for implementation and ongoing maintenance of these features. Further, the project is required to maintain structural stormwater BMPs in accordance with the SWQMP Operations and Maintenance Plan and to provide documentation of annual maintenance verification to the City as required by the Regional MS4 Permit.

A2-20 The comment includes concluding remarks and provides County contacts. This comment is noted. No response is required.

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Comment Letter A3

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

January 10, 2025

Robert Dmohowski
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054
rdmohowski@oceansideca.org

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GUAJOME LAKE HOMES PROJECT, SCH NO. 2022110028, SAN DIEGO COUNTY, CA

Dear Robert Dmohowski:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the City of Oceanside (City) for the Guajome Lake Homes Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

A3-1

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, CDFW appreciates 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; 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 (Fish & G. Code, § 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.

A3-2

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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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[2] of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of Oceanside has participated in the NCCP program by preparing a draft Subarea Plan (SAP) under the North County Subregional Multiple Habitat Conservation Program (MHCP) (San Diego Association of Governments 2003). The MHCP identifies critically important biological resources, which if lost to development, would result in significant specific or cumulative impacts within a given jurisdiction and across the MHCP subregion.

Unfortunately, the Oceanside SAP was not finalized and has not been adopted by the City nor has the City received permits from the Wildlife Agencies, CDFW and United States Fish and Wildlife Service (USFWS). The Focused Planning Area (FPA) nonetheless are considered highly relevant when evaluating the significance of biological resources on a given property within the cities comprising the MHCP planning effort.

A3-2 Cont.

PROJECT DESCRIPTION SUMMARY

Proponent: Rincon Homes

Objective: The objective of the Project is to construct 83 single family homes through approval of a development plan, tentative map, and density bonus. Development would occur on approximately 9.86 acres of the 16.78-acre Project site. The primary access point, Guajome Lake Road, would be improved. Additional Project activities include 40-foot curb-to-curb improvements, consisting of a 5.5-foot parkway and a 4.5-foot sidewalk. Lastly, the internal private road would be 28-32 feet wide with 5-foot sidewalks. The homes would be developed in the southern portion of the Project site, which has been previously disturbed and graded. The northernmost portion, along the riparian corridor, would be preserved and avoided; thus, leaving approximately 3.77 acres as open space.

A3-3

Project Alternatives: The DEIR provides three Project Alternatives: No Project Alternative, Townhome (Coastal Sage Scrub Impact Avoidance) Alternative, and Reduced Development Footprint Alternative. Under the No Project Alternative, the

A3-4

[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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Project site would remain undeveloped, and the proposed Project and associated implementations would not be executed. Under the Townhome (Coastal Sage Scrub Impact Avoidance) Alternative, the development plan is revised to accommodate 90 townhome units on 5.98 acres in the Project site. This alternative allows for approximately 3 acres north of the Project site to remain as open space. Under the Reduced Development Footprint Alternative, 72 single-family homes would be constructed and impacts to coastal sage scrub would be minimized as the Project would push the development footprint approximately 30 feet south from the limits of the coastal sage scrub. An approximately 25-foot-high shoring wall would be required, which would result in permanent impacts to coastal sage scrub; however, the impacts would be reduced when compared to the proposed Project. The open space and recreation areas would be removed from the development plans. According to the DEIR, the USFWS has expressed their support for the Reduced Development Footprint Alternative.

A3-4 Cont.

Location: The Project site is primarily vacant and located in the Guajome Neighborhood Area of the City. The Project site is along the north side of Guajome Lake Road and east of Albright Street. The City of Vista is approximately 0.1 miles east of the Project site and State Route 76 is half a mile north. An unnamed stream runs through the northern portion of the Project site and drains into Guajome Lake, located half a mile west in Guajome Regional Park. The water ultimately leaves Guajome Lake to connect with the San Luis Rey River. The Assessor's Parcel Number associated with the Project site is 157-412-1500.

A3-5

Biological Setting: The Project site is surrounded by residential development in the north, northwest, and east. In the south, the Project site is bounded by open space. The Project site's 50-foot planning buffer and 50-foot biological buffer overlaps partially with the FPA recognized in the MHCP and SAP. More specifically, the overlapped FPA is designated as a hardline preserve zone where it is specifically delineated with identified limits of development along with the corresponding on-site areas for conservation. The vegetation communities within the Project site are Diegan coastal sage scrub (2.20 acres), non-native grassland (8.87 acres), southern arroyo willow riparian forest (2.88 acres), non-native riparian (0.58 acres), and riparian forest (0.30 acres).

Dudek prepared a Biological Technical Report (BTR) which included vegetation mapping, and an aquatic resource delineation conducted in November 2021. Focused rare plant surveys were conducted in March and July 2022; no rare plant species were observed during surveys. Focused surveys for coastal California gnatcatcher (*Polioptila californica californica*; California Species of Special Concern (SSC); Endangered Species Act (ESA) listed-threatened) and least Bell's vireo (*Vireo bellii pusillus*; ESA listed-endangered; CESA listed-endangered) were conducted from March to July of 2022. Cooper's hawk (*Accipiter cooperii*; CDFW Watch List species), white-tailed kite (*Elanus leucurus*; CDFW Fully Protected), yellow warbler (*Setophaga petechia*; SSC), and coastal California gnatcatcher were observed within the Project site. Specifically, focused surveys confirmed the presence of one gnatcatcher pair that successfully

A3-6

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nested within the Diegan coastal sage scrub, with three fledglings observed with the adult pair during the final two site visits.

Sensitive species that are of potential concern for the Project include, but are not limited to, coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher (*Empidonax traillii extimus*; ESA listed-endangered; CESA listed-endangered), Crotch's bumble bee (Bombus crotchii; CESA listed-candidate), thread-leaved brodiaea (ESA listed-threatened; CESA listed-endangered; California Rare Plant Rank (CRPR) 1B.1), western spadefoot (*Spea hammondii*; SSC), Southern California legless lizard (*Anniella stebbinsi*; SSC), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*; SSC), and nesting birds and raptors. A3-6 Cont.

The DEIR proposes mitigation measures regarding off-site mitigation credits, landscaping, temporary installation fencing, environmental awareness training, work hours, best management practices, biological monitor requirements and duties, breeding season avoidance, general pre-construction surveys, nesting bird survey, coastal California gnatcatcher survey, California gnatcatcher nest avoidance and minimization measures, and Section 10 consultation.

Project History: In December 2022, CDFW provided comments on the Project's Notice of Preparation (NOP). In summary, there were comments regarding the Project setting, FPA, fuel modification, biological direct, indirect, and cumulative impacts, sensitive bird species, coastal California gnatcatcher, least Bell's vireo, a biological baseline assessment, wetland permitting obligations, and compensatory mitigation requirements. Some of our concerns in the NOP remain unresolved in the DEIR. A3-7

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below 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 and to ensure regional conservation objectives in the MHCP and draft Oceanside SAP would not be eliminated by implementation of the Project. We understand the City Council has voted not to adopt the draft SAP and that they released the Environmental Impact Report for the General Plan Update, which included provisions from the draft SAP; however, that plan is still not finalized nor is it subject to approval by the Wildlife Agencies. Additional comments or other suggestions may also be included to improve the document. A3-8

COMMENT # 1: Reduced Development Footprint Alternative

Issue: CDFW supports the Reduced Development Footprint Alternative, as the Project's current design will result in significant impacts to Diegan coastal sage scrub and associated species. A3-9

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Specific impact: Impacts to 1.25 acres of Diegan coastal sage scrub will have direct and indirect effects to special-status species through loss of foraging and nesting habitat, and through inhibiting wildlife movement. Reducing the development footprint by implementing the Reduced Development Project Alternative would reduce these impacts to Diegan coastal sage scrub and special-status species.

Why impact would occur: CDFW concurs with the USFWS that adopting the Reduced Development Footprint Alternative would reduce impacts to Diegan coastal sage scrub and special-status species who use this habitat. Under this Alternative, the proposed Project would include fewer units and impacts to Diegan coastal sage scrub would be reduced. This would allow suitable habitat for coastal California gnatcatcher and SSC to remain on site. With more available habitat, nesting and foraging opportunities for wildlife would remain consistent with current site conditions.

Additionally, the proposed Project may inhibit wildlife movement and encroach into sensitive habitat due to fuel modification zones (see Comment #2 and #3). With additional available open space under this Alternative, the City would have the opportunity to provide on-site compensatory mitigation for impacts to Diegan coastal sage scrub and other sensitive habitats. This mitigation should provide a wildlife movement pathway from the riparian habitat in the northern area of the Project site to the southern area of the Project site, possibly circumventing the need for off-site mitigation.

A3-9 Cont.

Evidence impact may be significant: Section 15126.6(e)(2) of the State CEQA Guidelines requires that an EIR identify an environmentally superior alternative among the alternatives evaluated. The Reduced Project Alternative is an environmentally superior alternative, compared to the proposed Project, that would reduce the impacts to natural habitat that supports CESA- and ESA-listed species.

A3-10

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #1: Adoption of the Reduced Development Footprint Alternative

CDFW strongly recommends the adoption of the Reduced Development Footprint Alternative for the Project.

A3-11

Recommendation #2: DEIR Reevaluation of Compensatory Mitigation

CDFW recommends that, having adopted the Reduced Development Footprint Alternative, on-site compensatory mitigation be prioritized. Due to site constraints, if on site mitigation in its entirety is not feasible, off-site mitigation should be implemented with the coordination of the Wildlife Agencies. Details associated with the long-term management and monitoring plans of the Quarry Creek Mitigation Site were not provided in the DEIR. Therefore, CDFW is unable to provide helpful feedback to protect the biological resources impacted by the Project in terms of the off-site mitigation.

A3-12

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CDFW welcomes coordination with the City and Project proponent to establish on-site mitigation to lessen significant impacts to the maximum extent feasible. A3-12 Cont.

Mitigation Measure #1: On-Site Compensatory Mitigation

Given that SSC and special-status wildlife species occur within the Project site, compensatory mitigation shall be provided for the temporary and permanent loss of any habitat supporting special-status species. There shall be no net loss of habitat supporting SSC [CEQA Guidelines, § 15370(e)]. Compensatory mitigation shall be provided within the Project boundary at no less than 2:1. Mitigation shall provide appropriate habitat (depending on the species), refugia, and habitat structures that support that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan shall include a discussion on the territory size; nesting, breeding, foraging, and refuge locations; invasive, non-native plant and wildlife species present; food availability; and how all life cycle functions will be mitigated. Any mitigation plan for SSC or special-status wildlife species shall be distributed and approved by CDFW prior to Project activities. The replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands. A3-13

Mitigation Measure #2: Habitat Management and Monitoring Plan

A qualified biologist shall be retained to draft a Habitat Management and Monitoring Plan (HMMP) and submit it to the City and CDFW for review and approval prior to Project activities. The HMMP shall outline initial and long-term management and maintenance activities that would occur on mitigation lands. The HMMP shall provide measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Maintenance activities outlined in the HMMP shall include measures pertaining to control of exotic vegetation, irrigation schedule, and protection from future maintenance activities. A3-14

COMMENT # 2: Wildlife Movement

Issue: The Project may impact local wildlife movement.

Specific impact: Buildout of the Project site as outlined in the Project Description will isolate the on-site riparian forest, because the proposed development would surround the FPA and separate suitable habitat for special-status species in the south. Impacts on wildlife could result in habitat fragmentation, permanent loss of suitable habitat, limited wildlife movement, increased human disturbance, reproductive suppression during breeding season, and/or population decline of a special-status species. A3-15

Why impact would occur: One pair of coastal California gnatcatchers and three fledglings were observed in the Project site during focused surveys in the Diegan coastal sage scrub. Moreover, the DEIR states, "Diegan coastal sage scrub also

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supports a variety of birds, reptiles, invertebrates, and small mammals commonly found in upland scrub" (page 4.3-9). While the Project site is located outside the Wildlife Corridor Planning Zone designated by the SAP, it may still provide movement for wildlife due to the site's proximity of Guajome Lake and Regional Park. Based on aerial imagery, it appears that the Project site allows wildlife species to move through the riparian habitat in the north. Additionally, the vacant Project site allows for movement south into more vacant habitats, connecting to Guajome Lake and Regional Park. Upon completion of the Project, wildlife movement would be constrained, and wildlife would be forced to move along the narrowed northern boundary of the Project site. Similarly, CDFW has concerns that species may be adversely impacted through edge effects from the loss of suitable habitat. The buildout of the proposed Project may not provide an effective buffer to neutralize edge effects as the undisturbed open space would restrict wildlife movement and may result in an increase in human disturbance. These indirect impacts should be discussed, analyzed, and mitigated for and reflected in the DEIR. In order to help address these indirect impacts, CDFW recommends the adoption of the Reduced Development Footprint Alternative (Comment #1). Conserving and restoring habitat connectivity and corridors is essential for mitigating impacts to special status species.

A3-15 Cont.

The DEIR states that movement is limited due to development on all sides; however, no wildlife movement study was conducted, nor was scientific data provided in the environmental document to demonstrate that wildlife movement would not be impacted by the Project. In addition to the physical constraints to wildlife movement, operational activities occurring 24 hours a day, seven days a week, may also deter wildlife from using the northern boundary. Without sufficient analyses and a wildlife movement study, the proposed Project may have significant impacts on local wildlife movement.

A3-16

Evidence impact may be significant: Without a wildlife movement study, CDFW cannot ascertain whether this potential impact to biological resources is less than significant under CEQA. Technical details such as data, maps, diagrams, and similar relevant information should be provided to permit full assessment of significant environmental impacts by reviewing agencies and members of the public (CEQA Guidelines, §15147). In the case of this Project, CDFW believes a wildlife movement study falls within the category of "technical detail".

Impacts on the special-status wildlife may require a mandatory finding of significance because the Project would potentially threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of endangered, rare, or threatened species (CEQA Guidelines, §15065). Habitat that supports wildlife movement and serves as wildlife migratory corridors are essential to the survival of many California species (Fish and Game Code §1955 (d)). With the increasing loss of suitable habitat and water sources on a local and regional scale, impacts to these biological resources would be considered significant impacts as a result of the Project.

A3-17

Recommended Potentially Feasible Mitigation Measure(s)

A3-18

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Recommendation #3: Wildlife Movement Revision

CDFW recommends the environmental document be revised to include a wildlife movement study, which may include modeling based on data. The analysis of wildlife movement through the Project site should include (but are not limited to) habitat loss and fragmentation, narrowing of the wildlife corridor within the Project site, and the introduction of barriers to wildlife movement. CDFW recommends such an analysis be supported by studies to document wildlife activity and movement through the Project site with emphasis on where development is proposed. If wildlife movement were adversely impacted, the DEIR should provide measures to mitigate the Project's significant impact to local wildlife movement.

A3-18 Cont.

Mitigation Measure #3: Wildlife Corridor Mitigation

If impacts to the wildlife corridor cannot be avoided, compensatory mitigation shall be provided for the temporal and permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function. The Wildlife Agencies shall be given the opportunity to review and provide feedback on any compensatory mitigation for loss of wildlife movement.

A3-19

COMMENT # 3: Fuel Modification Zone

Issue: The Project will impact Diegan coastal sage scrub through fuel modification activities within the 50-foot planning buffer of the site.

Specific impact: The DEIR does not clearly provide compensatory mitigation to offset the loss of habitat within the fuel modification zone. Impacts to native vegetation communities to create defensible space should be treated as permanent impacts to biological resources and mitigated as such.

Why impact would occur: The DEIR notes that the fuel modification zone is a, "…defensible space comprises an irrigated, well-maintained landscape that consists of fire-resistant plants within 30 feet of the building (Zone 1) and a thinned landscape in the areas between 30 and 100 feet (Zone 2) from the structures (where applicable)" (page 3-2). The proposed Zone 2 would require thinning of 0.16 acres of coastal sage scrub vegetation. This vegetation community provides suitable habitat for a variety of species including coastal California gnatcatcher and SSC within the Project site. Moreover, Figure 7 in the BTR depicts the proposed fuel modification zones lying within a coastal California gnatcatcher observed use area and where an observed nest was found.

A3-20

The DEIR stated that, due to site constraints, the fuel modification zones do not achieve the standard Oceanside Fire Department widths of 100 feet. To offset this, the Fire Protection Plan (Appendix O) proposes certain building code-required elements and code-exceeding mitigation measures. While CDFW appreciates this discussion of the fuel modification zones, it is unclear if the biological impacts of the fuel modification

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zones were analyzed in the DEIR. Specifically, we are unclear if the impacts of fuel modification zones on Diegan coastal sage scrub were considered when crafting MM-BIO-1. It is important to note that fuel modification activities constitute ongoing impacts that will perpetually impact the plant communities and the species that depend on these natural communities. Indirect effects (e.g., noise) from fuel modification activities may also have an impact on wildlife that utilizes the open space that abuts the Project site. Given that fuel modification activities will result in ongoing direct and indirect impacts to natural resources within the Project site and surrounding open space, compensatory mitigation should be provided. A3-20 Cont.

Evidence impact may be significant: Certain species are in danger of extinction because their habitats have been severely reduced in acreage, are threatened with destruction or adverse modification, or because of a combination of these and other factors. The CESA and NPPA provide additional protection for such species, including take prohibitions (Fish & G. Code, § 2050 et seq.; Fish & G. Code, § 1908). Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA locally sensitive vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. A3-21

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #4: Fuel Modification Impacts

The City should revise the DEIR to thoroughly describe the permanent impacts due to the implementation of the fuel modification zones. More specifically, compensatory mitigation exclusively relating to fuel modification zones should be included. CDFW recommends the City consult with the Wildlife Agencies for fuel modification strategies to limit impacts to biological resources. A3-22

Mitigation Measure #4: Compensatory Mitigation

The Project proponent shall provide compensatory mitigation for natural vegetation impacted within the fueling modification zone. At a minimum, the Project proponent shall demonstrate at least a 2:1 in-kind replacement ratio in the undisturbed areas of the Project site that is outside of the development footprint and fuel modification zone. A3-23

COMMENT # 4: Impacts to Crotch's Bumble Bee

Issue: The Project will impact suitable nesting and foraging habitat for Crotch's bumble bee. The DEIR did not discuss or provide a mitigation measure to minimize impacts to Crotch's bumble bee. A3-24

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Specific impact: The DEIR does not include survey results for presence or absence of Crotch's bumble bee, does not discuss potential impacts, or propose mitigation measures for this candidate listed CESA species. The Project may result in temporary impacts and permanent loss of suitable nesting and foraging habitat for Crotch's bumble bee.

Why impact would occur: According to CDFW's Crotch's Bumble Bee Range – CDFW [ds3095] dataset, the Project site lies within the current range for Crotch's bumble bee (CDFW 2024a). Diegan coastal sage scrub and grassland habitat within the Project site may provide suitable habitat to support Crotch's bumble bee. Moreover, the DEIR stated that rodent burrows have been observed within the area of potential effect. Crotch's bumble bees primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2012).

Given that the Project site is in the current range and has suitable habitat, there is potential for this CESA candidate species to be detected. No mitigation measures specific to Crotch's bumble bee were incorporated in the DEIR. If the Project proceeds without appropriate focused surveys, the Project may result in mortality and/or injury of undetected individual Crotch's bumble bee that may be present during Project activities. The Project's ground and vegetation disturbance could result in potentially significant impacts to Crotch's bumble bee, including loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

A3-24 Cont.

Evidence impact would be significant: Recently, the California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). CDFW considers impacts to species that are candidates for CESA listing to be significant, under CEQA. Accordingly, the Project may have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

A3-25

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #5: Crotch's Bumble Bee Discussion

The DEIR should be revised to provide a thorough discussion on the Project's potential direct and indirect impacts on Crotch's bumble bee. If the Project may impact Crotch's bumble bee, the DEIR should be amended to incorporate measures to minimize, and/or mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the

A3-26

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species. The discussion should be of a depth and scope that a CESA Incidental Take Permit (ITP) can be issued based on the analysis provided in the final EIR.

A3-26 Cont.

Recommendation #6: CEQA

CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

A3-27

Mitigation Measure #5: Crotch's Bumble Bee Surveys

The Project proponent shall retain a qualified entomologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.

A3-28

Mitigation Measure #6: Incidental Take Permit

If Crotch's bumble bee is detected on site, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.

A3-29

COMMENT # 5: Impacts on Rare Plants

Issue: The DEIR does not discuss or provide mitigation measures to reduce impacts to rare plant species.

Specific impact: The Project may impact suitable habitat for thread-leaved brodiaea and may directly or indirectly impact rare plant species. The DEIR does not provide a mitigation measure to minimize and avoid impacts to rare plant species if found within the impact area.

Why impact would occur: There is potential for thread-leaved brodiaea to occur due to suitable coastal sage scrub and grassland habitat in the Project site. There were also

A3-30

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observations on the California Natural Diversity Database (CNDDB) of rare plant species occurring within one mile of the Project site (CDFW 2024b). Project activities, such as vegetation removal and soil excavation, may result in adverse impacts to special-status plant species without an avoidance, minimization, and mitigation measure. Additionally, as focused surveys were conducted in 2022, rare plant species may have now taken resident in the Project site. CDFW recommends updated rare plant focused surveys be conducted and adhere to Mitigation Measure #7 (below). Impacts to rare plants such as removal of habitat or loss of population would be considered significant under CEQA.

A3-30 Cont.

Evidence impact may be significant: Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Consistent with CEQA Guidelines section 15380, thread-leaved brodiaea as an endangered species under CESA qualifies it as an endangered, rare, or threatened species under CEQA and should be treated as such. Additionally, thread-leaved brodiaea is a rare plant with a CRPR of 1B.1. Plants with a CRPR of 1B are rare throughout their range, endemic to California, and are seriously or fairly threatened.

Impacts to any sensitive or special status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. The Project and environmental document should be conditioned to avoid and/or mitigate for potential impacts to thread-leaved brodiaea if present. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

A3-31

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #7: Rare Plant Survey

Within one year prior to the commencement of ground-disturbing activities, habitat assessment surveys for the special-status plants shall be conducted by a qualified botanist. Surveys shall be in accordance with the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) and Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants (USFW 2000) at the appropriate time of year when the target species would be in flower or otherwise clearly identifiable. Locations of special-status plant populations shall be clearly identified in the field by staking, flagging, or fencing a minimum 100-foot-wide buffer around them prior to the commencement of activities that may cause disturbance.

A3-32

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Mitigation Measure #8: Compensatory Mitigation

If rare plants, such as plants with a CRPR of 1 or 2 are observed in the impact area and cannot be avoided, no Project activities shall commence, and the City shall coordinate with CDFW to discuss avoidance of the rare plants on site. If complete avoidance is unattainable, the Project proponent shall provide compensatory mitigation to offset the Project's impact on rare plants observed on site at no less than 2:1. The total habitat acreage within the mitigation land shall be no less than 2:1. The Project proponent shall acquire CDFW approved mitigation land that has presence of thread-leaved brodiaea, and/or other rare plant species, are located in the same watershed as the Project site. The mitigation land shall also provide equivalent or greater habitat value than that of the Project site. The Project proponent shall protect replacement habitat in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Government Code § 65967(c). Recordation of the conservation easement shall occur prior to commencement of Project activities. An appropriate endowment shall also be provided for the long-term monitoring and management of mitigation lands. A3-33

COMMENT # 6: Impacts on SSC

Issue: The DEIR does not discuss thorough SSC potential impacts due to Project activities, nor does it discuss avoidance, minimization, or mitigation measures for SSC species.

Specific impact: Direct impacts to SSC could result from Project construction and activities; ground disturbance; vegetation clearing; and trampling or crushing from construction equipment, vehicles, and foot traffic. Additionally, the Project would result in permanent loss of suitable habitat.

Why impact would occur: On-site vegetation provides suitable habitat for SSC, such as western spadefoot, Southern California legless lizard, and San Diegan tiger whiptail. Impacts to these habitats and the subsequent potential impacts on SSC are not assessed in the environmental document. Additionally, the BTR does not include updated biological surveys for presence within the Project site. Due to surveys being conducted in 2022, SSC may occur within the Project site during the time of construction. There are other ways in which the analysis and discussion of impacts on SSC is incomplete. While there is potential for these SSC to be present on site during Project activities, the DEIR does not provide an adequate mitigation measure to avoid direct or indirect impacts to them. Given that habitat loss on a local and regional scale is a major cause of population decline for SSC, removal of confirmed SSC habitat would be considered a significant impact and should be mitigated properly. A3-34

Evidence impact would be significant: A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria: A3-35

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1. if the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
2. if the species is listed as threatened or endangered under ESA-, but not CESA-, threatened, or endangered;
3. if the species meets the State definition of threatened or endangered but has not formally been listed;
4. if the species is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and
5. if naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or -endangered status (CDFW 2024c).

A3-35 Cont.

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). The DEIR does not provide mitigation for potential impacts on SSC. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special-status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

A3-36

Recommended Potentially Feasible Mitigation Measure(s)

Recommendation #7: Updated General Field Surveys

The BTR included field surveys conducted for special-status plant and wildlife species in 2022. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. In addition, it is possible that wildlife not previously observed on site are now residents and/or use the Project site for breeding, nesting, or foraging. For these reasons, CDFW strongly recommends the City require the Project proponent to retain a qualified biologist to perform an updated biological survey to account for the current state of the Project site and the inventory of biological species that may be present. The survey should be conducted at the appropriate time of year and time of day when sensitive species are active or otherwise identifiable for both wildlife and plants. Based on the survey results, the final CEQA document should propose avoidance and specific mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the CEQA document for public review.

A3-37

Mitigation Measure #9: General Pre-Construction Surveys - The City shall revise MM-BIO-9 to incorporate the <u>underlined</u> language and omit the language in strikethrough:

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~~Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season.~~ Within 72 hours of Project related activities, a qualified biologist with the appropriate handling permits shall conduct a survey to determine the presence of potential rare, listed, or other special-status wildlife species. The qualified biologist shall survey the proposed impact areas and a 50-foot buffer. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, or in loose soil. Should a special-status species be located in the Project site during pre-activity surveys all individuals shall be documented and locations of presence recorded. If a special-status species is found, the qualified biologist shall contact the Wildlife Agencies, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall obtain all appropriate permits and prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The list (or plan) of protocols shall be implemented during Project construction and activities/biological construction monitoring.

A3-38 Cont.

COMMENT # 7: Impacts on Nesting Birds and Raptors

Issue: Mitigation Measures BIO-7 and BIO-9 may be improved to ensure adequate surveys occur prior to the start of construction.

Specific impact: Project activities such as tree removal and vegetation clearing may result in mortality or injury to individual birds and raptors present within the Project site. Additionally, Project activities during breeding season of nesting birds could result in nest abandonment and/or incidental loss of fertile eggs or nestlings.

Why impact would occur: Cooper's hawk, white-tailed kite, yellow warbler, and coastal California gnatcatcher were observed within the Project site due to the riparian habitat, Diegan coastal sage scrub habitat, and trees present within the Project site. These species, and other potential bird species like least Bell's vireo and southwestern willow flycatcher, have moderate to high potential to forage within the Project site during the time of construction.

A3-39

Bird species can construct nests and begin laying eggs in less than seven days. Therefore, a pre-construction nesting bird survey scheduled within 14 days prior to construction may miss some instances of nesting. To minimize the chances of missing nests, CDFW recommends scheduling the survey within three days before the start of ground disturbing activities.

Evidence impact would be significant: Sections 3503, 3503.5, and 3513 of the Fish and Game Code protect nesting and migratory birds and birds of prey. Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto. Section 3503.5 states that it is unlawful to take, possess, or destroy

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any birds in the orders Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto. Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act.

A3-40 Cont.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #10: Biological Monitor Requirements and Duties - The City shall revise MM-BIO-7 to incorporate the underlined language and omit the language in strikethrough:

A qualified biologist shall be on site daily during initial clearing/grubbing and weekly during grading activities within 500 feet of preserved habitat to ensure compliance with all Project-imposed mitigation measures. The biologist shall be available during pre-construction and construction phases to review grading plans, address protection of sensitive biological resources, monitor ongoing work, and maintain communications with the Project's engineer to ensure that issues relating to coastal California gnatcatcher, least Bell's vireo, and their habitat are appropriately and lawfully managed. ~~The biological monitor should flush birds out of habitat areas before they are cleared.~~

The qualified biological monitor shall also be responsible for the following duties:

1. Oversee installation of and inspect temporary fencing and erosion control measures within or up-slope of avoided and/or preserved areas a minimum of once per week during installation and daily during all rain events until established to ensure that any breaks in the fence or erosion control measures are repaired immediately.
2. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.
3. Halt work, if necessary, and confer with the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and City of Oceanside (City) to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to USFWS, CDFW, and the City within 24 hours of its occurrence.
4. Submit weekly letter reports (including photographs of impact areas) via email to the City during clearing/grubbing of potential habitat and/or Project construction resulting in ground disturbance within 500 feet of avoided potential habitat. The weekly reports shall document that authorized impacts were not exceeded and general compliance with all conditions. The reports shall also outline the duration of monitoring, the location of construction activities, the type of construction that occurred, and equipment used. These reports shall specify numbers and locations of any coastal California gnatcatchers/least Bell's vireo and nests, sex, observed behavior (especially in relation to construction activities), and remedial

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measures employed to avoid, minimize, and mitigate impacts to coastal California gnatcatchers/least Bell's vireo and nests.

Submit a final report to the City within 60 days of Project completion that includes the following: (1) as-built construction drawings for grading with an overlay of any active nests; (2) photographs of habitat areas during pre-construction and post-construction conditions; and (3) other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with the avoidance/minimization provisions and monitoring program as required by USFWS and CDFW were achieved.

A3-41 Cont.

Mitigation Measure #11: Nesting Bird Survey - The City shall revise MM-BIO-9 Nesting Bird Survey to incorporate the underlined language and omit the language in strikethrough:

To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat will occur outside of the breeding season (February 15 to August 31). Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a City-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 300 feet of the construction area, and federally- or State-listed birds and raptors on or within 500 feet of the construction area. The pre-construction survey must be conducted within ~~10~~ 3 calendar days prior to the start of construction, the results of which must be submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected by the City-approved biologist, the following buffers shall be established: 1) no work within 300 feet of a non-listed nesting migratory bird nest, and 2) no work within 500 feet of a listed bird or raptor nest. However, the City may reduce these buffer widths depending on site-specific conditions (e.g. the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant will contact the City and Wildlife Agencies to determine the appropriate buffer.

A3-42

ADDITIONAL COMMENTS

Fully Protected Species. The DEIR notes that white-tailed kite was observed and there is potential for this Fully Protected species to forage within the Project site. Fully Protected Species may not be taken or possessed at any time according to the Fish and Game Code § 3511. CDFW cannot authorize take for white-tailed kite and the City must completely avoid impacts to these species during Project's construction and operational activities. CDFW recommends that the final EIR contain a discussion of full avoidance of impacts to white-tailed kite and include a mitigation measure, if appropriate.

A3-43

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Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A). A3-44

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB website[3] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms. A3-45

In addition, information on special-status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[4]. A3-46

The City should ensure data collected for the preparation of the DEIR is properly submitted. A3-47

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) A3-48

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments A3-49

[3] https://wildlife.ca.gov/Data/CNDDB
[4] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

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and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Joleena De La Fe[5], Environmental Scientist.

A3-49 Cont.

Sincerely,

DocuSigned by:
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Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Victoria Tang (CDFW EPM)
Jennifer Turner (CEQA Supervisor)
Melanie Burlaza (NCCP supervisor)
Joleena De La Fe (CEQA staff)
Emily Gray (NCCP staff)

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

[CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

[CDFW] California Department of Fish and Wildlife. 2023. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

[CDFW] California Department of Fish and Wildlife. 2024a. Crotch's Bumble Bee Range Dataset 3095. Available at: https://data.ca.gov/dataset/crotchs-bumble-bee-range-cdfw-ds3095

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[5] Phone: 858-354-3527; Email: Joleena.delafe@wildlife.ca.gov

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[CDFW] California Department of Fish and Wildlife. 2024b. California Natural Diversity Database. Available from: https://wildlife.ca.gov/Data/CNDDB

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Final MHCP Executive Summary. 2003. Multiple Habitat Conservation Program for the Cities of Carlsbad, Escondido, Oceanside, San Marcos, Solana Beach, and Vista.

Hatfield, R, S Jepsen, E Mader, S H Black, and M Shepherd. 2012. Conserving Bumble Bees Guidelines for Creating and Managing Habitat for America's Declining Pollinators. Portland, OR: The Xerces Society for Invertebrate Conservation

[UFWS] US. Fish & Wildlife Service. 2000. Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants. Available from: https://cnps.org/wp-content/uploads/2019/10/Bot-Cert_US-Fish-and-Wildlife-Service-guidelines-botanical-inventories-LR.pdf

Williams, P H, R W Thorp, L L Richardson, and S R Colla. 2014. Bumble Bees of North America: An Identification Guide. Princeton University Press.

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Recommendation #1: Adoption of the Reduced Development Footprint Alternative CDFW strongly recommends the adoption of the Reduced Development Footprint Alternative for the Project.	Prior to Project Initiation	Lead Agency
Recommendation #2: DEIR Reevaluation of Compensatory Mitigation CDFW recommends that, having adopted the Reduced Development Footprint Alternative, on-site compensatory mitigation be prioritized. Due to site constraints, if on site mitigation in its entirety is not feasible, off-site mitigation should be implemented with the coordination of the Wildlife Agencies. Details associated with the long-term management and monitoring plans of the Quarry Creek Mitigation Site were not provided in the DEIR. Therefore, CDFW is unable to provide helpful feedback to protect the biological resources impacted by the Project in terms of the off-site mitigation. CDFW welcomes coordination with the City and Project proponent to establish on-site mitigation to lessen significant impacts to the maximum extent feasible.	Prior to Project Initiation	Lead Agency
Mitigation Measure #1: On-Site Compensatory Mitigation Given that SSC and special-status wildlife species occur within the Project site, compensatory mitigation shall be provided for the temporary and permanent loss of any habitat supporting special-status species. There shall be no net loss of habitat supporting SSC [CEQA Guidelines, § 15370(e)]. Compensatory mitigation shall be	Prior to Project Initiation	Lead Agency / Project Proponent

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Mitigation Measure	Timing	Responsible Party
provided within the Project boundary at no less than 2:1. Mitigation shall provide appropriate habitat (depending on the species), refugia, and habitat structures that support that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan shall include a discussion on the territory size; nesting, breeding, foraging, and refuge locations; invasive, non-native plant and wildlife species present; food availability; and how all life cycle functions will be mitigated. Any mitigation plan for SSC or special-status wildlife species shall be distributed and approved by CDFW prior to Project activities. The replacement habitat shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.		
Mitigation Measure #2: Habitat Management and Monitoring Plan A qualified biologist shall be retained to draft a Habitat Management and Monitoring Plan (HMMP) and submit it to the City and CDFW for review and approval prior to Project activities. The HMMP shall outline initial and long-term management and maintenance activities that would occur on mitigation lands. The HMMP shall provide measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Maintenance activities outlined in the HMMP shall include measures pertaining to control of exotic vegetation, irrigation schedule, and protection from future maintenance activities.	Prior to Project Initiation	Qualified Biologist
Recommendation #3: Wildlife Movement Revision CDFW recommends the environmental document be revised to include a wildlife movement study, which may include modeling based on data. The analysis of wildlife	Prior to Project Initiation	Lead Agency

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Cont.

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Mitigation Measure	Timing	Responsible Party
movement through the Project site should include (but are not limited to) habitat loss and fragmentation, narrowing of the wildlife corridor within the Project site, and the introduction of barriers to wildlife movement. CDFW recommends such an analysis be supported by studies to document wildlife activity and movement through the Project site with emphasis on where development is proposed. If wildlife movement were adversely impacted, the DEIR should provide measures to mitigate the Project's significant impact to local wildlife movement.		
Mitigation Measure #3: Wildlife Corridor Mitigation If impacts to the wildlife corridor cannot be avoided, compensatory mitigation shall be provided for the temporal and permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function. The Wildlife Agencies shall be given the opportunity to review and provide feedback on any compensatory mitigation for loss of wildlife movement.	Prior to Project Initiation	Lead Agency
Recommendation #4: Fuel Modification Impacts The City should revise the DEIR to thoroughly describe the permanent impacts due to the implementation of the fuel modification zones. More specifically, compensatory mitigation exclusively relating to fuel modification zones should be included. CDFW recommends the City consult with the Wildlife Agencies for fuel modification strategies to limit impacts to biological resources.	Prior to Project Initiation	Lead Agency
Mitigation Measure #4: Compensatory Mitigation The Project proponent shall provide compensatory mitigation for natural vegetation impacted within the fueling modification zone. At a minimum, the Project proponent	Prior to Project Initiation	Project Proponent / Lead Agency

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Mitigation Measure	Timing	Responsible Party
shall demonstrate at least a 2:1 in-kind replacement ratio in the undisturbed areas of the Project site that is outside of the development footprint and fuel modification zone.		
Recommendation #5: Crotch's Bumble Bee Discussion The DEIR should be revised to provide a thorough discussion on the Project's potential direct and indirect impacts on Crotch's bumble bee. If the Project may impact Crotch's bumble bee, the DEIR should be amended to incorporate measures to minimize, and/or mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA Incidental Take Permit (ITP) can be issued based on the analysis provided in the final EIR.	Prior to Project Initiation	Lead Agency
Recommendation #6: CEQA CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to Project Initiation	Lead Agency
Mitigation Measure #5: Crotch's Bumble Bee Surveys The Project proponent shall retain a qualified entomologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee	Prior to Project Initiation	Project Proponent /

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Mitigation Measure	Timing	Responsible Party
Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.		Qualified Biologist
Mitigation Measure #6: Incidental Take Permit If Crotch's bumble bee is detected on site, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.	Prior to Project Initiation / During Project Construction	Project Proponent
Mitigation Measure #7: Rare Plant Survey Within one year prior to the commencement of ground-disturbing activities, habitat assessment surveys for the special-status plants shall be conducted by a qualified botanist. Surveys shall be in accordance with the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) and Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants (USFW 2000) at the appropriate time of year when the target species would be in flower or otherwise clearly identifiable. Locations of special-status plant populations shall be clearly identified in the field by staking, flagging, or fencing a minimum 100-foot-wide buffer around them prior to the commencement of activities that may cause disturbance.	Prior to Project Initiation	Qualified Biologist

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #8: Compensatory Mitigation If rare plants, such as plants with a CRPR of 1 or 2 are observed in the impact area and cannot be avoided, no Project activities shall commence, and the City shall coordinate with CDFW to discuss avoidance of the rare plants on site. If complete avoidance is unattainable, the Project proponent shall provide compensatory mitigation to offset the Project's impact on rare plants observed on site at no less than 2:1. The total habitat acreage within the mitigation land shall be no less than 2:1. The Project proponent shall acquire CDFW approved mitigation land that has presence of thread-leaved brodiaea, and/or other rare plant species, are located in the same watershed as the Project site. The mitigation land shall also provide equivalent or greater habitat value than that of the Project site. The Project proponent shall protect replacement habitat in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Government Code § 65967(c). Recordation of the conservation easement shall occur prior to commencement of Project activities. An appropriate endowment shall also be provided for the long-term monitoring and management of mitigation lands.	Prior to Project Initiation / During Project Construction	Lead Agency / Project Proponent
Recommendation #7: Updated General Field Surveys The BTR included field surveys conducted for special-status plant and wildlife species in 2022. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. In addition, it is possible that wildlife not previously observed on site are now residents and/or use the Project site for breeding, nesting, or foraging. For these reasons, CDFW strongly recommends the City require the Project proponent to retain a qualified biologist to perform an updated biological survey to	Prior to Project Initiation	Lead Agency / Project Proponent / Qualified Biologist

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Mitigation Measure	Timing	Responsible Party
account for the current state of the Project site and the inventory of biological species that may be present. The survey should be conducted at the appropriate time of year and time of day when sensitive species are active or otherwise identifiable for both wildlife and plants. Based on the survey results, the final CEQA document should propose avoidance and specific mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the CEQA document for public review.		
Mitigation Measure #9: General Pre-Construction Surveys - The City shall revise MM-BIO-9 to incorporate the underlined language and omit the language in strikethrough: ~~Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season.~~ Within 72 hours of Project related activities, a qualified biologist with the appropriate handling permits shall conduct a survey to determine the presence of potential rare, listed, or other special-status wildlife species. The qualified biologist shall survey the proposed impact areas and a 50-foot buffer. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, or in loose soil. Should a special-status species be located in the Project site during pre-activity surveys all individuals shall be documented and locations of presence recorded. If a special-status species is found, the qualified biologist shall contact the Wildlife Agencies, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall obtain all appropriate permits and prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The	Prior to Project Initiation	Lead Agency

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Mitigation Measure	Timing	Responsible Party
list (or plan) of protocols shall be implemented during Project construction and activities/biological construction monitoring.		
Mitigation Measure #10: Biological Monitor Requirements and Duties - The City shall revise MM-BIO-7 to incorporate the underlined language and omit the language in strikethrough: A qualified biologist shall be on site daily during initial clearing/grubbing and weekly during grading activities within 500 feet of preserved habitat to ensure compliance with all Project-imposed mitigation measures. The biologist shall be available during pre-construction and construction phases to review grading plans, address protection of sensitive biological resources, monitor ongoing work, and maintain communications with the Project's engineer to ensure that issues relating to coastal California gnatcatcher, least Bell's vireo, and their habitat are appropriately and lawfully managed. ~~The biological monitor should flush birds out of habitat areas before they are cleared.~~ The qualified biological monitor shall also be responsible for the following duties: 1. Oversee installation of and inspect temporary fencing and erosion control measures within or up-slope of avoided and/or preserved areas a minimum of once per week during installation and daily during all rain events until established to ensure that any breaks in the fence or erosion control measures are repaired immediately. 2. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust. 3. Halt work, if necessary, and confer with the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and City of	Prior to Project Initiation	Lead Agency

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Mitigation Measure	Timing	Responsible Party
Oceanside (City) to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to USFWS, CDFW, and the City within 24 hours of its occurrence. 4. Submit weekly letter reports (including photographs of impact areas) via email to the City during clearing/grubbing of potential habitat and/or Project construction resulting in ground disturbance within 500 feet of avoided potential habitat. The weekly reports shall document that authorized impacts were not exceeded and general compliance with all conditions. The reports shall also outline the duration of monitoring, the location of construction activities, the type of construction that occurred, and equipment used. These reports shall specify numbers and locations of any coastal California gnatcatchers/least Bell's vireo and nests, sex, observed behavior (especially in relation to construction activities), and remedial measures employed to avoid, minimize, and mitigate impacts to coastal California gnatcatchers/least Bell's vireo and nests. Submit a final report to the City within 60 days of Project completion that includes the following: (1) as-built construction drawings for grading with an overlay of any active nests; (2) photographs of habitat areas during pre-construction and post-construction conditions; and (3) other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with the avoidance/minimization provisions and monitoring program as required by USFWS and CDFW were achieved.		
Mitigation Measure #11: Nesting Bird Survey - The City shall revise MM-BIO-9 Nesting Bird Survey to incorporate the underlined language and omit the language in strikethrough:	Prior to Project Initiation	Lead Agency

A3-51
Cont.

Docusign Envelope ID: 3F5A8993-75FB-4DEE-B9B6-C4A4844887D8

Mitigation Measure	Timing	Responsible Party
To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat will occur outside of the breeding season (February 15 to August 31). Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a City-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 300 feet of the construction area, and federally- or State-listed birds and raptors on or within 500 feet of the construction area. The pre-construction survey must be conducted within ~~10~~ 3 calendar days prior to the start of construction, the results of which must be submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected by the City-approved biologist, the following buffers shall be established: 1) no work within 300 feet of a non-listed nesting migratory bird nest, and 2) no work within 500 feet of a listed bird or raptor nest. However, the City may reduce these buffer widths depending on site-specific conditions (e.g. the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant will contact the City and Wildlife Agencies to determine the appropriate buffer.		

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Response to Comment Letter A3

Agency
California Department of Fish and Wildlife
January 10, 2025

A3-1 The comment consists of an introductory statement. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A3-2 The commenter states California Department of Fish and Wildlife (CDFW)'s role and responsibilities as a trustee agency and possible responsible agency under CEQA. The commenter also notes their role as administrator of the Natural Community Conservation Planning (NCCP) and acknowledges that the City has prepared a draft Subarea Plan (Subarea Plan) under the North County Subregional Multiple Habitat Conservation Program (MHCP) that has not been finalized or adopted by the City or received permits from CDFW and the U.S. Fish and Wildlife Service (USFWS). The comment is noted as providing background information that does not raise any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A3-3 The comment summarizes the project description in the Draft EIR. The comment does not raise any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A3-4 The comment summarizes the project alternatives discussed in the Draft EIR. The comment does not raise any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A3-5 The comment summarizes the project site location, as discussed in the Draft EIR. The comment does not raise any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A3-6 The commenter summarizes the biological setting discussion provided in the Draft EIR, as well as information from the Biological Technical Report (BTR) (Appendix C) and proposed mitigation measures. The comment does not raise any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No response is required.

A3-7 The comment summarizes comments that were provided by the commenter in response to the Notice of Preparation. The comment states some of the commenter's concerns remain unresolved in the Draft EIR. The comment is noted as an introduction to comments that follow. Please refer to Responses to Comments A3-9 through A3-44 for responses to specific concerns raised in this letter.

A3-8 The comment is an introduction to comments provided below. The comment states that the City has not adopted the Subarea Plan and that plan has not been approved by the wildlife agencies. This comment is noted as an introduction and for providing background information. The comment does not raise any specific concerns or substantive issues regarding the adequacy of the Draft EIR, so no further responses is required. This comment is noted for the administrative record and included in the Final

EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-9 The commenter indicates support for the Reduced Development Footprint Alternative which reduces impacts to Diegan coastal sage scrub and special-status species that use this habitat. The commenter suggests that under this Alternative, the City would have the opportunity to provide on-site compensatory mitigation for impacts to Diegan coastal sage scrub and other sensitive habitat as well as wildlife movement.

The commenter's support for the Reduced Development Footprint Alternative is noted and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation. The decision-makers will make the ultimate determination on the feasibility of Project alternatives. As discussed in Draft EIR Chapter 8, Alternatives, while the Reduced Development Footprint Alternative would reduce certain impacts to biological resources compared to the project, project impacts to biological resources would be similarly reduced to less than significant with mitigation incorporated, such that the alternative would result in similar less than significant impacts to biological resources as compared to the project with mitigation incorporated. The alternative may also increase impacts to recreation by removing onsite amenities.

In addition to considering the alternative's ability to reduce a significant impact of the project, decision makers will consider if the alternative would meet most of the basic project objectives and its feasibility. Thus, Section 8.4.2.3 of the Draft EIR explains that although this alternative would develop infill housing on an urbanized site and assist the City to implement its housing goals, it would include fewer affordable and market-rate units, limiting the creation of housing opportunities and failing to meet project Objectives 3 and 4.

Legal, social, and economic feasibility of the Alternative would also be considered, particularly in light of the state Density Bonus Law and the Housing Accountability Act. The Draft EIR Section 8.4.2.3 explains that because the project qualifies for a density bonus due to its provision of affordable housing, the City may not refuse to grant the bonus, incentives, and waivers that allow it to develop the proposed 83 single-family units. While there are limited exceptions, they have not been shown to apply.

Responding to the comment that this alternative would provide an opportunity to on-site compensatory mitigation, possibly circumventing the need for off-site mitigation, the comment is noted. At present, Mitigation Measure (MM)-BIO-1 provides for off-site creation of coastal sage scrub at the Quarry Creek mitigation site, which is currently managed by the San Diego Habitat Conservancy. This off-site mitigation was chosen as the preferred mitigation based on discussions with USFWS and CDFW in 2024. Revising the project to incorporate on-site mitigation would go against those agencies' stated preference for this off-site creation and preservation of high-value habitat at an existing preserve. In the absence of feasible habitat acquisition opportunities or available conservation banks within the City and based on confirmed coordination with the appropriate wildlife agencies, the Quarry Creek site is considered a suitable and acceptable alternative to on-site compensatory mitigation.

A3-10 The commenter identifies the requirement under CEQA that an environmentally superior alternative be evaluated and indicates their opinion that the Reduced Development Footprint Project Alternative is the environmentally superior alternative.

Based on the evaluation of alternatives to the project discusses in Draft EIR Chapter 8, Alternatives, the Townhome Alterative was identified as being environmentally superior because it would avoid direct impacts to coastal sage scrub, avoid take of the federally listed coastal California gnatcatcher, and avoid impacts to sensitive riparian areas (Draft EIR, p. 8-11). Refer also to Response to Comment A3-9 above for further discussion related to the Reduced Development Footprint Alternative. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-11 The commenter recommends the adoption of the Reduced Development Footprint Alternative in lieu of the project. Refer to Responses to Comments A3-9 and A3-10 above. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-12 The commenter recommends adoption of the Reduced Development Footprint Alternative and reevaluation or prioritization of on-site compensatory mitigation with that Alternative. The comment further notes that because details associated with the long-term management and monitoring plans of the Quarry Creek Mitigation Site were not provided in the Draft EIR, CDFW is unable to provide helpful feedback in terms of the off-site mitigation.

In regard to adoption of a Reduced Development Footprint Alternative that includes on-site compensatory mitigation, refer to Responses to Comments A3-9 and A3-10 above. The City acknowledges the comment and its suggestion that if the City adopts the Reduced Development Footprint Alternative, then on-site compensatory mitigation be prioritized as suggested in the comments that follow in A3-13 and A3-14. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

Generally, an EIR is required to include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project" (CEQA Guidelines, § 15126.6(d)). The discussion of alternatives need not be exhaustive. The comment requests the City craft detailed mitigation measures for an alternative, which is not required by CEQA. To the extent this may be considered a variation on the Reduced Development Footprint Alternative or alternative to a component of the project, the EIR is not required to consider such alternatives. (See *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 491 [EIR need not consider variations of alternatives], *Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993 (EIR not required to consider alternative to component of a project].) Thus, the creation of detailed mitigation for the Alternative is not required by CEQA.

However, in response to the comment, Draft EIR Section 8.4.2.2 has been revised to clarify that, although this alternative layout may allow for on-site compensatory mitigation to occur to some extent, this alternative is expected to require mitigation measures similar to Mitigation Measure (MM)-BIO-1 through MM-BIO-5 proposed for the project to reduce significant impacts to biological resources. Revisions are shown in ~~strikeout~~/underline to page 8-7 of Draft EIR Chapter 8, Alternatives as shown in Chapter 3, Errata, of this Final EIR). Off-site mitigation at the Quarry Creek mitigation site has been identified in negotiations with permitting regulatory agencies as their preferred mitigation. Refer to Response to Comment A3-9. The Quarry Creek mitigation site is a preserve currently managed by San

Diego Habitat Conservancy. As outlined in MM-BIO-11, all terms and conditions developed as part of the Section 10 consultation process with USFWS and provided in the project's Habitat Conservation Plan (HCP) shall be implemented.

A3-13 The commenter recommends that the Reduced Development Footprint Alternative shall implement on-site compensatory mitigation of no less than 2:1 for the temporary and permanent loss of special-status habitat within the project boundary; that there be no net loss of habitat supporting Species of Special Concern (SSC), and that mitigation provide appropriate habitat to support the species. The commenter recommends mitigation plans be distributed and approved by CDFW, and replacement habitat be protected under a conservation easement.

In response, the City understands the comment as suggesting that if the City adopts the Reduced Development Footprint Alternative, then on-site compensatory mitigation be crafted as suggested. The City will include this comment for review and consideration by the decision-makers before making the final decision on the project.

As concerns the project, note that the BTR, included as Appendix C, includes a 2:1 mitigation ratio for impacts to Diegan coastal sage scrub. Implementation of MM-BIO-1 would create 6.64 acres of coastal sage scrub at the Quarry Creek mitigation site, which is a preserve currently managed by San Diego Habitat Conservancy. Further, as outlined in MM-BIO-11, ratios for habitat-based mitigation and other terms and conditions shall be finalized during the Section 10 consultation process with USFWS. Additionally, since there is no Implementing Agreement between the City and the wildlife agencies for the Oceanside Subarea Plan, the mitigation ratios provided in the plan are used as a guidance, and the City has discretion as to when they require mitigation. Off-site mitigation at the Quarry Creek Mitigation Site has been identified in negotiations with permitting regulatory agencies as their preferred mitigation alternative.

A3-14 The commenter recommends mitigation related to preparation of a Habitat Management and Monitoring Plan (HMMP) for the Reduced Development Footprint Alternative.

In response, the City understands the comment as suggesting that if the City adopts the Reduced Development Footprint Alternative, then mitigation include an HMMP. The City will include this comment for review and consideration by the decision-makers before making the final decision on the project.

As concerns the project, no HMMP is required because proposed project mitigation would occur off-site mitigation at the Quarry Creek mitigation site (see Responses to Comments A3-12 and A3-13). This off-site mitigation has been identified in negotiations with permitting regulatory agencies as their preferred mitigation alternative. Since the Subarea Plan has not been adopted, take of habitat for coastal California gnatcatcher (i.e., coastal sage scrub) will need to be granted through the Section 10 consultation process with the USFWS (MM-BIO-11). An HCP will be prepared as part of the Section 10 consultation process and will include details regarding off-site mitigation. The USFWS will review and must approve the HCP and associated mitigation proposal prior to the issuance of grading permits. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-15 The comment states the project may have potential direct and indirect impacts related to wildlife movement and suggests that the project may not provide an effective buffer to neutralize edge effects as the undisturbed open space would restrict wildlife movement and may result in an increase in human disturbance. The commenter requests that these direct and indirect impacts to wildlife movement should be discussed, analyzed, and mitigated for and reflected in the Draft EIR. The commenter also recommends adoption of the Reduced Development Footprint Alternative to address indirect impacts.

Section 4.3, Biological Resources, under Threshold (d) concludes the proposed project would not result in the loss of wildlife corridors or habitat linkages because the riparian corridor, which would constitute the main area for wildlife movement, will not be impacted, and wildlife movement around and along the stream will not be restricted. Furthermore, the riparian corridor is fragmented, with portions entirely absent off-site, upstream and downstream of the site. The site is surrounded by development, which limits movement of larger mammals. Although relatively isolated from large undeveloped areas and other preserves, the Diegan coastal sage scrub supports coastal California gnatcatcher and likely serves as a stepping-stone for dispersing individuals and habitat for the resident pairs. Because of this, the site does not function as part of a larger, contiguous wildlife corridor. In addition, the project site is located outside the designated Wildlife Corridor Planning Zone outlined in the Subarea Plan.[1] The project provides for buffers from the edge of development and the riparian corridor, which minimizes the potential for indirect impacts (see Section 4.3.4 of the Draft EIR). The existing house located within the Subarea Plan buffer will be demolished as a part of project construction. Per Subarea Plan requirements, all areas of non-native vegetation and developed areas within the buffer will be landscaped with native vegetation (MM-BIO-2). Since the project would not directly impact any potential wildlife corridors and provides an adequate buffer between the development and the riparian corridor, the project would not substantially interfere with wildlife movement and impacts related to habitat movement were determined to be less than significant. For these same reasons, reproductive suppression and/or population decline of a special-status species related to wildlife movement is unlikely to occur as a result of the project. Refer to Responses to Comments A3-9 through A3-12 above for discussion related to the Reduced Development Footprint Alternative.

A3-16 The commenter suggests that, without sufficient analyses and a wildlife movement study, the proposed project may have significant impacts on local wildlife movement. The comment also states that operational activities occurring 24/7 may deter wildlife from using the northern boundary.

Refer to Response to Comment A3-15 regarding the impact analysis for wildlife movement and indirect impacts that was provided in the Draft EIR. Further study of wildlife movement is not warranted for the following reasons: 1) The riparian corridor represents the primary wildlife movement potential, and it will not be directly impacted by the project; 2) a buffer is provided between the project and the riparian corridor; 3) the riparian corridor is not contiguous upstream or downstream of the project site. Therefore, wildlife movement is already limited; and 4) there is no Implementing Agreement between the City and the wildlife agencies for the Oceanside Subarea Plan, and no permitting agencies have requested a specific wildlife movement study beyond what is presented in the BTR (Appendix C). Further, the project site and riparian corridor currently abuts existing residential developments to the

[1] As discussed in Sections 2.3 and 4.3.1 of the Draft EIR, while not approved or permitted, the Subarea Plan has been prepared and is used as a guidance document for development projects in the City. The City encourages project applicants to abide by the guiding principles of the plan when designing projects, including the avoidance of designated preserve areas. However, the Subarea Plan acknowledges that areas of designated preserve can overlap with private ownership; therefore, the boundaries may be revised on a project-by-project basis (Draft EIR, p. 4.3-10).

north, east, and west. To the extent wildlife is currently using the northern boundary, project operation will consist of similar residential uses. The proposed buffer, fully shielded lighting, perimeter fencing, and other project design features will further minimize operational impacts. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-17 The commenter states technical details such as data, maps, diagrams, and similar relevant information should be provided to permit a full impact assessment, and that a wildlife movement study falls within the category of "technical detail" as required by CEQA. The comment suggests that project-related impacts on special-status species may require a mandatory finding of significance. Please refer to Responses to Comments A3-15 and A3-16 above for responses related to local wildlife movement. The narrative, maps, and graphics provided in both Section 4.3 and Appendix C support the Draft EIR's good faith effort at full disclosure of the project's potentially significant impacts under CEQA. As detailed in the Draft EIR and Responses to Comments A3-15 and A3-16, the data and substantial evidence provided supports the conclusion the project would not result in significant impacts to wildlife movement based on its location surrounded by existing residential development, fragmentation of the riparian corridor, project design with buffers to minimize impacts, etc. For these reasons, further study is not needed to evaluate project impacts. (*Gray v. County of Madera* (2008) 167.Cal.App.4th 1099, 1125 [finding agency not required to accept regulatory agency's recommendation for further biological studies because substantial evidence supported the EIR's finding and CEQA, "does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project.]) The level of detail provided complies with the CEQA Guidelines and provide sufficient detail to evaluate environmental impacts.

In response to the comment that a "mandatory finding of significance" may be required per CEQA Guidelines, § 15065, note that standard applies to the lead agency determination of whether to prepare an EIR. Having required an EIR for the project, the City has applied the thresholds of significance described at Section 4.3.3 and has undertaken a full analysis of potential biological impacts pursuant to those thresholds. The Draft EIR analysis and BTR, Appendix C, further supports the adequacy of the analysis, the conclusion that impacts to wildlife movement would be less than significant, and the determination that the mitigation proposed would reduce other identified potentially significant impacts to biological resources below a level of significance.

A3-18 The commenter recommends that the Draft EIR be revised to include mitigation for preparation of a wildlife movement study to evaluate impacts to wildlife movement. Please refer to Responses to Comments A3-15 through A3-17. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-19 The commenter recommends mitigation for potential impacts to wildlife corridors including compensatory mitigation to ensure habitat shall be replaced at a ratio appropriate to maintain no net loss. In response, please refer to Responses to Comments A3-15 through A3-17. Because impacts have been identified as less than significant, no mitigation is required.

A3-20 The commenter suggests the project would impact Diegan coastal sage scrub through fuel modification activities within the 50-foot planning buffer and compensatory mitigation to offset the loss of habitat

within the fuel modification zone should be provided. The commenter is also unclear if the impacts of fuel modification zones on Diegan coastal sage scrub were considered when crafting MM-BIO-1. In response, please refer to Appendix C, which states that direct project impacts to vegetation are shown in Table 5, Permanent Impacts, Mitigation, and On-Site Avoidance within the Proposed Project Site, and Figure 7, which illustrates the distribution of biological resources on the proposed project site and the extent of the proposed impacts, including the fuel modification zone (Draft EIR Appendix C, pp. 23 and 24).

To clarify, all biological resources within the project's impact footprint are considered direct and permanent impacts, and the project's impact footprint includes the fuel modification zones. As such, the fuel modification zones are already considered direct and permanent impacts of the project and were, therefore, considered when crafting MM-BIO-1. The narrative and graphics provided in Appendix C, as well as Section 4.3, demonstrate the Draft EIR's good faith effort at full disclosure of the project's potentially significant impacts to biological resources under CEQA. Justification of proposed mitigation for the project is outlined in the BTR, included as Appendix C.

Regarding noise impacts from fuel modification activities, maintenance of the fuel modification zone would occur periodically and would not be any louder than regular lawn maintenance activities of residents. Further, the project site currently abuts existing residential developments to the north, east, and west. To the extent wildlife is currently using the northern boundary, project operation will consist of similar residential uses. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-21 The commenter provides a concluding statement related to the project's potential permanent impacts to sensitive vegetation communities due to implementation of the fuel modification zones that could result in substantial adverse effect to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. In response, please refer to Response to Comment A3-20 above. The level of detail provided in the Draft EIR complies with the CEQA Guidelines and provides sufficient detail to evaluate environmental impacts. The City acknowledges the comment also provides background information and regulations. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-22 The commenter requests that the City revise the Draft EIR to describe the permanent impacts due to implementation of the fuel modification zones and provide compensatory mitigation for those impacts. The comment recommends the City consult with Wildlife Agencies for fuel modification strategies to limit impacts to biological resources. Please refer to Response to Comment A3-20 above for responses related to permanent impacts from the fuel modification zones and that MM-BIO-1 addresses those impacts. The City acknowledges the consultation comment which is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-23 The commenter suggests that the project provide compensatory mitigation for vegetation impacted by the fuel modification zone and demonstrate at least a 2:1 in-kind replacement ratio in the undisturbed areas of the project site that is outside of the development footprint and fuel modification zone.

Refer to Response to Comment A3-20. Off-site mitigation at the Quarry Creek Mitigation Site is proposed and was negotiated with permitting regulatory agencies as their preferred mitigation alternative. As such, no on-site mitigation is proposed. However, the BTR, included as Appendix C, explains that MM-BIO-1 mitigates for impacts to Diegan coastal sage scrub at a 2:1 mitigation ratio. This includes Diegan coastal sage scrub that would be impacted by fuel modification, as explained above. Further, ratios for habitat-based mitigation shall be finalized during the Section 10 consultation process with USFWS (MM-BIO-11). Additionally, since there is no Implementing Agreement between the City and the wildlife agencies for the Oceanside Subarea Plan, the mitigation ratios provided in the plan are used as a guidance, and the City has discretion as to when they require mitigation.

Offsite habitat conservation and/or enhancement has long been recognized as appropriate mitigation pursuant to CEQA. Refer to, e.g., CEQA Guidelines, § 15370 (e), providing that mitigation includes, "[c]ompensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements." See also, *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 794 [upholding gnatcatcher mitigation that provided for on-site or off-site preservation of similar habitat at a 2:1 ratio], *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1038-1040 [upholding mitigation requiring purchase of habitat reserves at less than 1:1 ratio where additional mitigation could lead to a "reduction in levels of development," and harm the public through "a shortage of housing supply."]; *Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 528 [finding "sufficient evidence in the record that conservation of habitats through easements and other methods would mitigate the impact on the biological resources to a less than significant effect".]) This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-24 The commenter states that the Draft EIR does not include results of presence or absence surveys for Crotch's bumble bee, potential impacts, or propose mitigation measures to deter adverse impacts or accidental take of the species. The commenter cites the CDFW's dataset to justify that the project site lies within the current range of Crotch's bumble bee which suggests that existing conditions on the project site may provide suitable habitat and conditions for Crotch's bumble bee to nest during February through lake October.

In response, the comment that Crotch's bumble bee has been identified as a candidate for listing under the California Endangered Species Act (CESA) and is subject to interim protections is acknowledged. At this time, it is our understanding CDFW's preparation and submittal of a status review report remains pending, after which the California Fish and Game Commission will come to final decision on whether or not to list the bee.

It is acknowledged that the project site – like most of the coastal southern and central California – lies within the range of Crotch's bumble bee per CDFW's data set. The bee has a low potential to occur within the non-native grasslands onsite that make up the majority of the proposed project's footprint. This is because these areas are regularly mowed, limiting the potential for floral resources necessary for the species. There is a moderate potential for them to occur within the coastal sage scrub located onsite. To provide more clarification regarding Crotch's bumble bee and its potential to occur onsite, including known occurrences within the vicinity of the project site, text revisions to Appendix C and Section 4.3, Biological Resources, of the Draft EIR are shown in ~~strikeout~~/underline within Chapter 3,

Errata, of this Final EIR. Since coastal sage scrub on the site could provide habitat for potential nesting, foraging, and overwintering for the Crotch's bumble bee, MM-BIO-9 has been added to ensure impacts to the Crotch's bumble bee remains less than significant. MM-BIO-9 has been updated to require a habitat assessment and three focused preconstruction surveys for the species if Crotch's bumble bee is legally protected under CESA as a Candidate or Listed species at the time ground-disturbing activities are scheduled to begin. The preconstruction surveys are most appropriate because bumble bees move nest sites each year, changing their nest and foraging locations. Appendix C and Section 4.3, Biological Resources, of the Draft EIR, have been updated to describe that an Incidental Take Permit (ITP) could be required if take of Crotch's bumble bee is present on the site and cannot feasibly be avoided (refer to Chapter 3, Errata, of the Final EIR). The appropriate consultation and other steps described will be taken if Crotch's bumble bee is detected during the preconstruction surveys to ensure avoidance and minimization of impacts to the species to the satisfaction of CDFW, and focused surveys are not necessary prior to finalizing the CEQA document.

In addition, per MM-BIO-8 of the Draft EIR, the proposed project will make every effort to avoid clearing vegetation from the site during the nesting bird season (defined as February 15 to August 31), which overlaps with Crotch's bumble bee nesting period (February 1 through October 31). Thus, MM-BIO-8 will similarly reduce the risk of impacts to nesting Crotch's bumble bee.

Further, MM-BIO-1 requires off-site compensatory mitigation for impacts to Diegan coastal sage scrub and non-native grassland through the creation of 6.64 acres of coastal sage scrub at the Quarry Creek mitigation site. This creation and preservation of 6.64 acres of coastal sage scrub would mitigate for impacts to bee habitat and foraging resources.

The BTR, included as Appendix C, has been updated to include measures to minimize and/or mitigate potential impacts to Crotch's bumble bee. Revisions are shown in ~~strikeout~~/underline for Appendix C and Section 4.3, Biological Resources, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR).

A3-25 The commenter states that the CDFW considers impacts to species that are candidates for CESA listing to be significant, under CEQA and, as such, any impacts to Crotch's bumble bee would be significant. Please refer to Response to Comment A3-24 above.

A3-26 The commenter requests that the analysis in Draft EIR should include a discussion of a depth and scope that a CESA ITP can be issued based on the analysis provided in the Final EIR. Please see Response to Comment A3-24 above. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-27 The commenter suggests that to minimize additional requirements by CDFW pursuant to Fish and Game Code Section 2081 and/or under CEQA, the project's Final EIR should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP. Please see Response to Comment A3-24 above for a response to this comment. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-28 The commenter requests mitigation related to Crotch's bumble bee surveys and states that focused surveys shall follow the cited CDFW's Survey Considerations related to Crotch's bumble bee. Additional language and a mitigation measure (MM-BIO-9) specific to Crotch's bumblebee has been included in Appendix C and Section 4.3, Biological Resources, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR) in response to this comment. Specifically, the mitigation measure states that surveys will "be based on recommendations described in the Survey Considerations for CESA Candidate Bumble Bee Species, released by CDFW on June 6, 2023, or the most current version at the time ground-disturbing activities are scheduled to begin." Compliance with these survey considerations will ensure no missed detections. Please also refer to Response to Comment A3-24 above.

A3-29 The commenter requests that, if take of Crotch's bumble bee is required, the Project proponent provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal. Refer to Response to Comment A3-24 above and associated text revisions provided in Chapter 3, Errata, of the Final EIR. The appropriate consultation and other steps described will be taken if Crotch's bumble bee is detected during the preconstruction surveys to ensure avoidance and minimization of impacts to the species to the satisfaction of CDFW.

A3-30 The commenter suggests that Draft EIR does not discuss or provide mitigation measures to reduce impacts to rare plant species. The commenter suggests that since the time of the project's focused surveys conducted in 2022 and discussed in Appendix C, rare plant species may have now taken resident in the Project site. The commenter recommends that updated rare plant focused surveys should be performed.

In response, conditions on site remain consistent with when the surveys were conducted in 2022 and the Notice of Preparation of an EIR for this project was released on November 2, 2022. The site was identified to have low potential for brodiaea to occur and was not detected during focused plant surveys. It would be speculative to assume that rare plants occupy the site where thread-leaved brodiaea has not been identified at the site and the nearest know occurrence is roughly 1 mile to the south. Further, a project applicant must base their BTR on studies conducted at a specific point in time. It is not practical or feasible to require applicants to continually amend or update analyses throughout the years-long environmental review process. For these reasons, no additional rare plant surveys are warranted. Given the project's focused surveys did not identify any rare plant species and were performed within the past three years, mitigation measures related to either this or other rare plant species are not required as no impact would occur to these species.

A3-31 The commenter states that, consistent with CEQA Guidelines Section 15380, thread-leaved brodiaea as an endangered species under CESA qualifies it as an endangered, rare, or threatened species under CEQA and, therefore, potential impacts to this species would be significant and the Draft EIR and project should be conditioned to avoid and/or mitigate for potential impacts to thread-leaved brodiaea if present and should be treated as such.

In response, the comment provides background regulatory information and discusses status of thread-leaved brodiaea, which will be provided to decision-makers. Thread-leaved brodiaea was identified as having a low potential to occur onsite, and the project's focused surveys performed within the last 3 years did not identify any rare plant species, including thread-leaved brodiaea. Therefore, impacts to rare plants – including thread-leaved brodiaea—would be less than significant and no mitigation is

required for potential impacts to these species. For this reason, the City does not concur with the comment suggesting additional mitigation measures related to rare plant species.

To the extent the comment generally states impacts to sensitive or special status species should be considered significant unless clearly mitigated below significance, please refer to Section 4.3, which states that with implementation of MM-BIO-1 through MM-BIO-11, all identified direct and indirect impacts to biological resources would be reduced to less than significant and the proposed project would be in accordance with federal, state, and local regulations. Justification of proposed mitigation for the project is outlined in the BTR, included as Appendix C and as revised in Chapter 3, Errata, of the Final EIR.

A3-32 The commenter provides language for recommended mitigation measures to reduce impacts to rare plant species. Please see Responses to Comments A3-30 and A3-31 above.

A3-33 The commenter requests compensatory mitigation for rare plant species. No rare plant species have been observed or are likely to occur onsite. As such, no compensatory mitigation is required. Please see Responses to Comments A3-30 and A3-31 above for responses to these comments.

A3-34 The commenter states that Draft EIR does not discuss or provide mitigation measures to reduce impacts to California SSC. The commenter states that since the project's biological-focused surveys were conducted in 2022, SSC may occur in the project site during the time of construction. In response, none of the SSC cited by the comment were identified during the numerous surveys that occurred on the site. See BTR, Table 1, Schedule of Surveys, and Section 3.2.1 confirming that "All wildlife species observed or detected during the surveys were recorded," which did not include the SSC referenced in the comment. Current conditions on-site remain consistent with conditions during surveys conducted in 2022. It should also be noted that the Notice of Preparation of an EIR for this project was released on November 2, 2022. The baseline for a CEQA project is the environmental setting at the time the Notice of Preparation (NOP) is released. Furthermore, a project applicant must base their EIR on studies conducted at a specific point in time. It is not practical or feasible to require applicants to continually amend or update analyses throughout the years-long environmental review process. For these reasons, no additional biological surveys are warranted as the Draft EIR supports the determination that the project would not significantly impact the SSC directly or through habitat modification.

To ensure impacts to special-status wildlife would not occur during initial clearing and grubbing, MM-BIO-3 through MM-BIO-10 are required, which would generally reduce impacts to the species related to construction, including construction equipment, foot traffic, vehicles, and similar activities noted by the comment, by requiring the installation of construction fencing, environmental awareness training, limited work hours, limiting activities to the fenced project footprint, and biological monitoring. Further, in response to the comment, MM-BIO-9 has been updated to also require pre-construction surveys 72 hours prior to commencement of ground-disturbing activities or vegetation removal and, if such species are found, implementation of appropriate relocation protocols following contact with the Wildlife Agencies. Revisions are shown in ~~strikeout~~/underline for Appendix C and Section 4.3, Biological Resources, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR).

A3-35 The commenter provides criteria for identifying California SSC. The comment is noted as providing background information related to the prior and subsequent comment. Please see Response to

Comment A3-34 above for responses related to SSC. This is not a comment on the adequacy of the Draft EIR. No further response is required.

A3-36 The commenter states that the Draft EIR does not discuss or provide mitigation measures to reduce impacts to SSC which meet the CEQA definition of rare, threatened, or endangered species. Please see Response to Comment A3-34 above for responses related to SSC. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-37 The commenter recommends the City require the Project proponent to retain a qualified biologist to perform updated biological surveys to account for the current state of the project site and the inventory of biological species that may be present. Please see Response to Comment A3-34 above.

A3-38 The commenter recommends revisions to MM-BIO-9 of the Draft EIR. See Response to Comment A3-34 above. The text of MM-BIO-9 has been revised per the recommendations in this comment. Revisions are shown in ~~strikeout~~/underline for Appendix C and Section 4.3, Biological Resources, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR).

A3-39 The commenter outlines impacts to nesting birds and raptors disclosed in the Draft EIR and recommends revisions to MM-BIO-7 and MM-BIO-9 to minimize those impacts. In response, the text has been updated to include CDFW's recommended revisions to MM-BIO-7 and MM-BIO-9 in the Draft EIR. Revisions are shown in ~~strikeout~~/underline for Appendix C and Section 4.3, Biological Resources, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR).

A3-40 The commenter cites sections of the Fish and Game Code that protect nesting and migratory birds. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

A3-41 The commenter recommends revisions to MM-BIO-7. Refer to Response to Comment A3-39 above.

A3-42 The commenter recommends revisions to MM-BIO-9. Refer to Response to Comment A3-39 above.

A3-43 The commenter recommends the Final EIR include discussion of full avoidance and mitigation measures, if appropriate, to the white-tailed kite. In response, the BTR states that undeveloped riparian habitats within the proposed project site have the potential to support White-tailed kite. The BTR also states that there are no proposed impacts to the undeveloped riparian habitats within the site. Therefore, no additional analysis or mitigation measures are warranted. Please refer to Section 4.3, which states that while riparian habitat within the project may support species such as the least Bell's vireo and white-tailed kite, project development has been sited to ensure all direct impacts to wetlands/riparian areas are eliminated. For instance, the project would avoid development in the northernmost portion of the site, which includes the riparian corridor, thereby preserving approximately 6.92 acres of the 16.78-acre site as open space. Although fencing is discussed on page 4.3-21 in Draft EIR Section 4.3, Biological Resources, to ensure that the fencing is described adequately in the EIR, Section 3.2.5, Project Design Features, has been revised to include a specific fencing Project Design Feature. Revisions to Draft EIR Chapter 3, Project Description, and Section 4.3, Biological Resources, are shown as ~~strikeout~~/underline in Chapter 3, Errata, of this Final EIR. Please also refer to Draft EIR

Section 4.3, Biological Resources, which states that with implementation of MM-BIO-1 through MM-BIO-11, direct and indirect impacts to biological resources would be reduced to less than significant and the proposed project would be in accordance with federal, state, and local regulations.

A3-44 The commenter recommends the Final EIR include the mitigation measures included in this comment letter and Attachment A of the comment letter (identified as Comment A3-51). These measures are noted for review by the decisionmakers. Please refer to Letter A3 responses and Chapter 3, Errata, of this Final EIR, for text revisions incorporated into the EIR.

A3-45 The comment includes an online link to the California Natural Diversity Database and requests that species detected during surveys be reported to the California Natural Diversity Database. This comment is noted. No response is required because the comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

A3-46 The comment includes information on additional website references and online links to submit environmental data. This comment is noted. No response is required because the comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

A3-47 The comment includes a request of the City to ensure data collected for preparation of the Draft EIR is submitted properly. This comment is noted. No response is required because the comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

A3-48 The comment includes information on CDFW CEQA filing fees. This comment is noted. No response is required because the comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

A3-49 The comment includes concluding remarks and requests that CDFW have an opportunity to review and comment on responses as well as receive notification of upcoming hearing dates. CDFW will be contacted when the Final EIR is complete and hearing dates have been confirmed.

A3-50 The comment references Attachment A (indicated as A3-51 in bracketed comment letter A3) and cites preparers of and references compiled for the comment letter. This comment is noted. No response is required because the comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

A3-51 The comment includes the commenter's proposed Mitigation Monitoring and Report Program revisions for biological resources. Refer to Response to Comment A3-44 above.

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Comment Letter I1

Robert Dmohowski

From: Randy Cocking <ccopm@yahoo.com>
Sent: Friday, November 29, 2024 10:56 AM
To: Robert Dmohowski
Cc: Debbie Cocking I. C. E
Subject: 83 Home Development Guajome Lake Rd. Tentative Tract Map T22-00004

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Greetings. My name is Randy Cocking and I am a resident of Park Lake Estates (Vista Del Lago) since 1987. Upon viewing Tract Map T22-00004 for Guajome Lake Homes Project I find myself, along with most of my neighbors, deeply concerned about the traffic that will be generated on Guajome Lake Road by this project. Although improvements are planned for the street directly in front of the tract, I see no further improvements for Guajome Lake Road. This is a poorly thought out plan to handle the increased flow of traffic to Highway 76 or North Santa Fe. As you know, Guajome Lake Road is a patchwork of asphalt, dirt and gravel. Not safe for such a traffic increase. I can also forsee night time traffic becoming a safety concern due to increased traffic. Please consider accessing Melrose Drive as an additional corridor to Highway 76 along with Guajome Lake Road as a betteralternative. Last of all, increased traffic along Guajome Lake Road to Osborne/North Santa Fe/Vista Way will be an invitation for disaster as the Guajome Lake Road/Osborne is already becoming overly saturated for those accessing Highway76 to I-15. I1-1 I1-2 I1-3

In closing, I am pro smart growth but before plopping a huge tract like this in such a restrictive area, please invest in sensible improvements for the surrounding traffic infrastructure before moving forward. Please let me know your thoughts. I1-4

Respectfully,

Randy Cocking
5343-Erie-Ct-92056
760-842-3168

Yahoo Mail: Search, Organize, Conquer

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Response to Comment Letter I1

Individual
Randy Cocking
November 29, 2024

I1-1 The comment consists of an introductory statement and states concern about project traffic generation on Guajome Lake Road. These concerns are addressed in Responses to Comments I1-2 and I1-3 below.

I1-2 The commenter expresses concerns regarding traffic that would be generated on Guajome Lake Road due to project implementation and that improvements to Guajome Lake Road beyond the project frontage are needed to handle the increased flow of traffic to Highway 76 or North Santa Fe. The commenter also expresses concerns regarding nighttime traffic safety with the project and requests consideration of accessing Melrose Drive as an additional corridor to Highway 76 along with Guajome Lake Road.

In response, the CEQA impact significance determination for the proposed project is based only on vehicle miles traveled (VMT) and not on level of service (LOS), which residents would commonly view as "traffic" or "delay" impact. Under CEQA, LOS or other measures of vehicle capacity or traffic congestion (i.e., traffic delay) are no longer considered in evaluating whether a significant impact on the environment would occur; therefore, the LOS analysis referred to in the EIR and its Local Transportation Analysis (LTA) in Appendix K has been provided for informational purposes only. Thus, to the extent the comment expresses concerns about traffic, the comment does not raise a CEQA issue. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

Off-site improvements are evaluated based on their nexus to the project (i.e., does the proposed project result in substantial volumes of traffic such that there are impacts to offsite segments). As shown in Appendix C, City of Oceanside Project Information Form, of Appendix L, Vehicle Miles Traveled Analysis, the project trip distribution is 50% to/from State Route (SR)-76 and 50% to/from N. Santa Fe Ave, based on traffic engineering judgement and factors such as proximity to SR-76 and local traffic generators and attractions. The project driveway at Guajome Lake Road is the only location where more than 50 peak hour trips are added to the surrounding roadway network. Thus, the project driveway at Guajome Lake Road was included in the study area evaluated in the project's Draft LTA, Appendix K. As outlined in Section 4.15 of the Draft EIR, Traffic and Circulation, and the project's LTA, Guajome Lake Road currently carries approximately 744 average daily trips (ADT) and the project would generate an additional 830 ADT. The roadway currently operate at an acceptable LOS C condition, thus the roadway in its current condition is considered adequate to safely handle the increased traffic generated by the project. Based on the City's traffic thresholds and methodology, traffic based roadway improvements are not required (Draft EIR, 4.15-12). However, the project will pave the segment of Guajome Lake Road along the project site frontage northwest to Albright Street, approximately 1,200 linear feet (Draft EIR, p. 3-5), which will improve this segment to the standards of a Collector road. According to City roadway standards paving this segment will increase the capacity of the roadway such that the LOS on this segment will be enhanced to LOS A, as shown in Table 10, Existing Plus Project Segment Level of Service, of Appendix K. Note that corrections have been made to Table 4.15-6, Existing Plus Project Street Segment Operations, to reflect the correct roadway segment on Guajome

Lake Road, as well as the "exiting plus project" traffic volume, volume to capacity ratio (V/C), and LOS for the roadway segment identified in that table. Revisions are shown in ~~strikeout~~/underline for Section 4.15, Traffic and Circulation, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR). The project driveways will be constructed per City standards ensuring adequate sight distance is available for vehicles exiting the project site along Guajome Lake Road. The project will also be required to pay thoroughfare and traffic fees totaling $300,128 (assuming current rate of $3,616/unit). These fees are intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process.

The project would not increase night-time traffic to an extent that is atypical of residential development that already exists in the surrounding area, or to such a degree as would cause a safety concern, for the same reasons as discussed above.

Additional connections and improvements to other roadways in the area, such as Melrose Drive, is beyond the scope of this project and its transportation impacts. Melrose Drive does not intersect with Guajome Lake Road. Creating access from within the project site to Melrose Drive would increase the project's impacts to biological resources because it would require disturbance to the riparian corridor in the northern portion of the project site, which is within the Subarea Plan buffer. It would also require a bridge to cross the creek and construction across parcels that are not part of the project site and not owned by the project applicant. Further, the construction of Melrose Drive between Spur Avenue and N. Santa Fe Avenue has not been deemed feasible for various reasons. In sum, the increase in traffic due to the project in the existing and cumulative conditions has been adequately analyzed in the project's LTA.

I1-3 The commenter expresses concern over safety resulting from increased traffic and existing traffic saturation within the area. Please refer to the discussion in Response to Comment I1-2, above. The comment raises concerns about traffic congestion, which is not a CEQA impact. Further, as described above (Response to Comment I1-2), the project will not significantly increase traffic along Guajome Lake Road, including its intersections to other roadways.

As discussed in Section 4.15.4 (c) of the Draft EIR, Traffic and Circulation, the project does not propose any sharp curves or dangerous intersections, and circulation and vehicle use on site would be typical of a single-family residential development. Additionally, emergency access points would be provided along the southern boundaries of the project site, and final project plans would undergo review by the Oceanside Fire Department to ensure compliance with fire code standards. The project's Draft LTA (Appendix K) provides an analysis of cumulative conditions which show that there are no approved or pending projects in the vicinity that would add more traffic to this roadway segment of Guajome Lake Road or adjoining facilities. Therefore, the potential for an increase in traffic has been evaluated in the project's LTA and found to be acceptable per the City's standards.

I1-4 The commenter ends their letter with conclusory remarks that request sensible improvements for the surrounding traffic infrastructure before moving forward. Please refer to Responses to Comments I1-2 and I1-3 above. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

Comment Letter I2

Robert Dmohowski

From: riellyirishclan@gmail.com
Sent: Friday, December 27, 2024 1:25 PM
To: Robert Dmohowski
Cc: 'Jennifer Schauble'
Subject: My Concerns: Guajome Lake Road Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Hi Robert,

As mentioned in my first communication with you I probably have the most concerns over this project because it affects me the most. The density of the project will be up against my boarder there will be 12-14 homes just in that one area looking directly into my home. As mentioned in the EIR the offsets were requested to be removed. However, those offsets would have meant at least the homes should be LOWER than my home and away from the border. The whole entire area and I have lived here for over 55 years was always horse oriented. The neighbor directly below me has horses, and now her way of life is threatened as well, because you know any fly that occurs will be a nightmare for her. She keeps her pens immaculate and works with her horses daily. Now the park overlay, no access for horses, no expansion, straightening, speed limits, emergency access – the list goes on and on. It was apparent like it is again this time, information was sent out during the holiday period with limited time frame to reply or debate. It is going to change the demographics of this beautiful area forever. The developer gets in, gets paid, gets out and you get tax benefits. What the residents who have lived in multigeneration are left with another greed and nightmare, to live with, all while we have been paying our taxes and hoped someone in the city would have our backs. It is too dense period! The cars alone would generate more accidents, and since you are not planning to widen or repair roads it will be so unsafe and a dust storm all day long. I2-1 I2-2 I2-3 I2-4 I2-5

You could have built a beautiful, limited residents with horse access to enhance this area, now its just going to be a housing development in the middle of a park – the residents are entitled to more meetings with the developer to try and discuss alternatives that will be livable. My request is for meetings in the 2025 year. I2-6

As far as the environmental impact, it will run very deep. San Luis Rey River from early settler's time has been rich for agriculture and much wildlife – as a resident I see that daily. I enjoy that I like country living and want to continue living the country life forever, but now that is all threatened by this development. The high-density development would negatively impact all residents and take away rural nature of the area permanently., I did not see any indication of Equestrian Development Standards – which this area is designated equestrian overlay district. I2-7 I2-8

To return to some comments in the EIR which state the area has been graded appropriately is false. The only thing that ever happened on that property was weed removal, no preparation of soil, grading etc. It also states the homes would not impact the environment, due to not much traffic on the road – I don't know if you did the survey in the middle of the night, but since the new high school was built years ago – Guajome Lake Road is a major freeway two times a day with the mother load taking the kids to school, people use this road as a shortcut instead of Mission or Santa Fe. I2-9 I2-10

Inclosing, Robert, I really would appreciate you setting up meetings in 2025 that all parties can attend and once again voice our concerns. I2-11

Diane Rielly

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Response to Comment Letter I2

Individual
Diane Rielly
December 27, 2024

I2-1 The commenter begins their letter with introductory remarks and general opposition regarding the project. This comment does not raise any specific issues related to the adequacy of the Draft EIR, and no further response is required.

I2-2 The commenter expresses concerns regarding the density of the project and views of the project from the commenters home.

Initially, note the project's aesthetic impacts are evaluated in Section 4.1 of the Draft EIR pursuant to the significance thresholds identified in the CEQA Guidelines, Appendix G. Pursuant to these thresholds, impacts to private views are not considered a significant impact related to aesthetics. Further, the project is located in an urbanized area such that the project is reviewed for potential conflict with applicable zoning and other regulations governing scenic quality, not whether it would substantially degrade the existing visual character or quality of public views of the site and its surroundings. Section 4.1.4 described why the project was determined to result in a less than significant impact to aesthetics. Please refer to Section 4.1.3 for an overview of the significance criteria used to evaluate the project's aesthetic impacts and Section 4.1 of the Draft EIR, Aesthetics, for a full evaluation of the potential for the project to have significant aesthetic impacts. See also Responses to Comments O5-3, O5-4, O5-5, and O5-6 (below) which address the interplay of the project's waivers under the state Density Bonus Law with this analysis.

As discussed in Section 4.1 of the Draft EIR, the project would be visible from adjacent parcels and may be visible from some distant public viewpoints due to the proposed height of the buildings. However, the project would be visually consistent with surrounding residential developments, given its location within a residentially developed area and the use of architectural styles and materials consistent with those of neighboring homes. Although the project would introduce new sources of light and glare, these impacts are expected to be minimal due to the use of non-reflective materials in the proposed architecture. The project would integrate with the surrounding environments, ensuring it does not significantly impact scenic vistas or City-protected resources. Additionally, required compliance with the City Municipal Code and implementation of project design features would ensure that impacts related to aesthetics would be less than significant.

In response to the commenter's concern about views of the proposed homes from their home, private views of a project are not relevant to a CEQA analysis (i.e. under CEQA, public views are analyzed). Nonetheless, in response, the proposed home would be setback approximately 60 feet from the nearest structure on the commenter's property. Also, the finished floor elevation of the home would be at a lower elevation than the existing structure on the commenter's property. As a result, it is unlikely that there would be direct private views in to the doors or windows of the proposed homes due to distance and lower finished floor elevation of the proposed home.

I2-3 The commenter expresses general opposition to the project and concerns regarding how the project would affect nearby horse owners, the park overlay, and traffic safety. The comment also expresses

concern that information was sent out during the holiday period and that the project would change the demographics of the area.

The project is consistent with the Scenic Park Overlay zoning requirements and does not request any waivers from those requirements. The requested waivers of Equestrian Overlay Standards would not affect nearby horse owners. The intent of the equestrian overlay is to provide for recreational opportunities and establish design standards and criteria that accommodate keeping and protection of horses on private property. There are no equestrian trails that cross the project site currently and no access point into the park immediately across from the project site; thus, there is no legal path of travel for equestrians to access Guajome Regional Park through this site and the proposed development would not impede equestrians from using existing access points. The project site is designated for residential development. Residential uses are generally considered compatible with equestrian uses, and perimeter fencing and retaining walls will ensure separation from existing equestrian uses in the surrounding area. Therefore, as discussed in Table 4.10-1 of the Draft EIR, while the project would not provide equestrian facilities on site, it would not impact existing equestrian uses in the surrounding area.

A more detailed summary of project compliance with applicable development standards has been added to Draft EIR Table 3.3-1, which provides an outline of the development standards and requested waivers of the overlay standards under state density bonus law as needed to accommodate the housing proposed on the site. Text changes have been made in ~~strikeout~~/ underline in Chapter 3, Errata, of this Final EIR. Refer also to Response to Comment O5-5 (below) which address the interplay of the project's waivers under the state Density Bonus Law with the analysis.

Regarding environmental issue areas, the comment addresses general subject areas that received extensive analysis in the Draft EIR. Because the comment does not raise any specific issue regarding the EIR analysis, no more specific response is required. Nonetheless, in response to the commenter's concerns associated with project-related traffic safety concerns, please refer to Response to Comment I1-3 above, addressing safety resulting from increased traffic within the area. In response to the commenter's concerns regarding speed limits, the speed limit for the entire road would remain at 25 miles per hour. Additionally, the project would be required to incorporate traffic calming measures, such as speed cushions/tables and advisory signage, on Guajome Lake within the existing right-of-way as a condition of approval to ensure motorists alter their speed to the project site and surrounding area, as described in the revised Draft EIR Chapter 3, Project Description, and Section 4.15, Traffic and Circulation, with text additions and revisions shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. Note that the final design and location of such measures shall be subject to the satisfaction of the City Traffic Engineer.

In regard to the commenter's concerns regarding emergency access, the project would provide all required emergency access in accordance with the requirements of the Oceanside Fire Department, as detailed in Draft EIR Sections 4.13, Public Services, and 4.15, Traffic and Circulation

Additionally, as discussed in Section, 4.12, Population and Housing, of the Draft EIR, the surrounding area already includes land developed or designated for residential uses, and land that has not been developed is designated as Open Space, limiting further substantial development of the area.

In response to the concern that information was sent out during the holiday with limited time frame to reply or debate, the Draft EIR was published and distributed in accordance with California State Clearinghouse requirements and City requirements. In acknowledgement of the fact that the Draft EIR public comment period overlapped the end of year holiday period, the City provided a 51-day public comment period from November 20, 2024, through January 10, 2025, which exceeds the 45-day public comment period mandated in the CEQA statute and guidelines. The Draft EIR public comment period was extended an extra week beyond the required review period of at least 45 days to avoid the comment period closing during New Years week.

Further, public comment on the Draft EIR is not the only opportunity for the public to receive information and provide feedback. The City circulated a Notice of Preparation (NOP) published November 2, 2022, to interested agencies, organizations, and parties, and posted notice with the State Clearinghouse. A public scoping meeting was held on November 15, 2022, to discuss the project. Comments received during the NOP public scoping period were considered as part of the preparation of the Draft EIR (Appendix A, Notice of Preparation and Public Scoping Comments). A Final EIR has now been prepared, which includes this formal Responses to Comments document and the project will subsequently be considered at public hearing before the Planning Commission. The comment does not raise specific issues with the adequacy of the Draft EIR content, and therefore no further response is required.

I2-4 The commenter states the developer is getting tax benefits from the project and raises concern that long-term residents will not benefit from the project. This is not a comment on the adequacy of the Draft EIR and does not raise any concerns related to a physical effect on the environment. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

I2-5 The commenter states the project is too dense and references concerns related to increased car accidents, dust, and the need for road repairs and road widening. In addition to the response to this comment below, please refer to Responses to Comments I1-2 and I1-3 above for further project traffic and road safety discussion. Refer to Responses to Comments O5-2 through O5-4 below concerning the project's permitted density under the state Density Bonus Law and other housing laws.

Summary of Project-Related Traffic and Proposed Road Improvements. As discussed in response I1-2, the CEQA impact significance determination for the proposed project is not based on LOS, which residents would commonly view as "traffic" or "delay" impact. Under CEQA, LOS or other measures of vehicle capacity or traffic congestion (i.e., traffic delay) are no longer considered in evaluating whether a significant impact on the environment would occur; therefore, the LOS analysis referred to in the EIR and its Local Transportation Analysis (LTA) in Appendix K has been provided for informational purposes only. The LTA addresses whether road widening or repairs are needed to address a significantly worsened traffic condition resulting from the project and cumulative impacts. Appendix K evaluates the increase in traffic within the study area, the Guajome Lake Road/N. and S. project driveway intersections, and Guajome Lake Road along the project frontage street segment (Draft EIR Appendix K, p. 7). This evaluation calculated LOS during the AM and PM peak hours with and without the addition of project trips. Based on the City's traffic thresholds and methodology, offsite roadway improvements would not be required because the project would not result in exceedance of City thresholds. As discussed in Draft EIR Section 4.15, Traffic and Circulation, the LTA conducted for the project evaluated four scenarios: Existing, Existing Plus Project, Near Term, and Near Term Plus Project, and determined

that the project would not result in traffic impacts as defined in the Oceanside Traffic Guidelines; thus no off-site roadway improvements are recommended or required.

Nonetheless, Guajome Lake Road would be improved over the length of the property frontage and extending northwest to connect to Albright Street, approximately 1,200 linear feet. Road improvements would include 40-foot-wide curb to curb improvements, including a 5-foot parkway and a 5-foot sidewalk. The internal private road would be 28 to 32 feet wide with 5-foot-wide sidewalks (Draft EIR, p. 3-2). In addition, circulation and emergency access drives have been designed in consultation with Oceanside Fire Department staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site (Draft EIR, p. 3-5). This would ensure adequate emergency access and safe driving conditions.

The project does not propose improvements to an unpaved segment of Guajome Lake Road located southeast of the project site. As shown in the LTA and summarized above, the proposed project would not add substantial traffic volume to Guajome Lake Road to require additional off-site improvements. As shown in Table 4.15-8 of Section 4.15 (Draft EIR, pp. 4.15-15 and 4.15-16), the study area street segment is calculated to operate acceptably at LOS D or better with and without the addition of project-generated trips; therefore, based on the City's traffic thresholds and methodology, and per discussion with City staff, additional off-site roadway improvements to Guajome Lake Road are not required of the project, including the unpaved portion of Guajome Lake Road located southeast of the project site. However, the project will be required to pay its fair share of thoroughfare and traffic fees totaling $300,128 (assuming current rate of $3,616/unit). These fees are intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process.

Construction Dust: As described in Draft EIR Section 4.2, Air Quality, emissions of particulate matter, which includes fugitive dust emissions, were determined to be less than significant for project construction. Section 4.2 and Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report, explain that the project would be required to comply with San Diego Air Pollution Control District (SDAPCD) Rule 55 as a Project Design Feature. Rule 55 regulates fugitive dust emissions from construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009). To better clarify within the EIR, these required construction dust control procedures have been added to the project as a project design feature ([PDF]-AQ-1). The revisions apply to Draft EIR Section 3.2.5, Project Design Features, and Draft EIR Section 4.2, Air Quality, with text additions and revisions shown in ~~strikeout~~/<u>underline</u> in Chapter 3, Errata, of the Final EIR.

Operational Dust: Project-generated operational dust impacts were analyzed in Draft EIR Section 4.2, Air Quality, and Appendix B. CalEEMod modeling for the project has been updated to include emissions calculations for project-generated vehicle travel along the 800-foot segment of unpaved Guajome Lake Road southeast of the project site. The revisions apply to Draft EIR Section 3.2.5, Project Design Features, and Draft EIR Section 4.2, Air Quality, with text additions and revisions shown in ~~strikeout~~/<u>underline</u> in Chapter 3, Errata, of the Final EIR. As indicated in Chapter 3, the revised modeling assumptions associated with fugitive dust related to project-related travel on this unpaved segment of Guajome Lake Road would result in an increase in PM_{10} and $PM_{2.5}$ emissions

during operation of the project. However, PM_{10} and $PM_{2.5}$ emissions during operation of the project would remain below the SDACPD emission-based threshold. Therefore, consistent with the analysis in the Draft EIR, impacts associated with project-generated operational criteria air pollutant emissions would remain less than significant with mitigation incorporated (Mitigation Measure [MM]-AQ-2) and the additional input would not result in a new potentially significant impact. Rather, the additional analysis supports the original impact conclusion in the Draft EIR associated with operational criteria air pollutant emissions.

I2-6 The commenter suggests the developer could have built a beautiful project, that alternatives should be discussed, and requests meetings with the developer to discuss alternatives in 2025. The comment is noted as expressing general opposition to the project but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response is required. Draft EIR Chapter 3, Project Description, describes how the project's architectural design, landscaping, open space design, and other feature have taken into consideration the project's proximity to Guajome Regional Park, the visual profiles in the area, and the equestrian surroundings and been designed in a manner that is compatible with the visual character of the area and community.

Concerning alternatives, the Draft EIR Chapter 8, Alternatives, evaluated several alternatives to the proposed project pursuant to CEQA for their ability to meet the basic objectives of the project while reducing or avoiding the environmental impacts of the project. Those alternatives include: (1) No Project Alternative (Section 8.4.1); (2) Reduced Development Footprint Alternative (Section 8.4.2); and (3) Townhome (Coastal Sage Scrub Impact Avoidance) Alternative (Section 8.4.3). The commenter is referred to that chapter of the document. As concerns the comment's request for meeting, a public hearing before the Planning Commission hearing will be held after the release of the Final EIR, which will include this formal Responses to Comments document. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation,

I2-7 The commenter suggests that there will be a large environmental impact resulting from the project that threatens the rural nature of the area. Draft EIR Chapter 4, Environmental Analysis, describes the potential environmental impacts of the project and recommends mitigation measures to reduce impacts. As discussed throughout Chapter 4, implementation of the proposed project would result in potentially significant impacts to air quality, biological resources, cultural resources, and geology and soils before mitigation. However, with implementation of mitigation measures described in Draft EIR Chapter 4, all of the identified potentially significant environmental impacts would be reduced to less than significant. In regard to concerns with the rural nature of the area and project compatibility, refer to Responses to Comments I2-2 above and I2-8 below. This comment does not raise any specific issues related to the adequacy of the Draft EIR. Therefore, no revisions to the Draft EIR or further response are required.

I2-8 The commenter expresses concern that the project's high-density development will negatively impact all residents and the rural nature of the area, and that the project does not address Equestrian Development Standards. In response, the Draft EIR includes measures to minimize significant environmental impacts of the project, including the preservation of the riparian corridor north of the proposed development and the implementation of mitigation measures to protect special-status species (see Section 4.3, Biological Resources, of the Draft EIR). As discussed in Section 4.1,

Aesthetics, the project would not introduce high-density housing but rather single-family homes consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with existing residential developments in the area. The City of Oceanside General Plan defines the high-density housing residential land use category as developments with 21 to 43 units per acre which is significantly higher than the project's proposed 83 single-family homes on a gross acreage of 16.78 acres, which is 4.9 dwelling units per acre. The architectural design and materials would blend with surrounding homes, maintaining the community's aesthetic appeal. As described in Draft EIR Chapter 3, Project Description, the project's proposed architectural styles are influenced by the equestrian nature of the surrounding area and local points of interest, creating a natural and rustic landscape for its residents (Draft EIR, pp. 3-4 and 3-5). In addition, the project also incorporates open space and landscaping elements that maintain the scenic quality of the area and preserve natural habitats.

In regard to concerns about density and proposed waivers, including Equestrian Overlay District Development Standards, please refer to the analysis provided in Draft EIR Section 4.10, Land Use and Planning. In summary, the requested project entitlements include a development plan, tentative map, and request for density bonus under the state Density Bonus Law. Because the project would provide four designated deed-restricted very-low-income housing units, Density Bonus Law requires the City to grant an incentive/concession and unlimited waivers. In order to accommodate the density allowed under Density Bonus Law, the project cannot physically comply with all of the development standards that apply to standard projects. Based on the proposed design to accommodate the project at the density permitted under Density Bonus Law and with the amenities proposed, the project seeks a waiver of some development standards, including the equestrian development standards. A summary of the development standards and required waivers are outlined in Table 3.3-1 in Draft EIR Chapter 3, Project Description (see Chapter 3, Errata, of this Final EIR for updates to this table) to demonstrate compliance with the City's zoning designation for the project site, or where Density Bonus Law waivers are requested.. The proposed dwelling unit distribution also complies with the City of Oceanside Inclusionary Housing Ordinance requirements and the provisions of Density Bonus Law regarding affordable housing. With approval of the requested density bonus, the proposed project would be consistent with the City's zoning designation for the project site, and implementation of the project would not conflict with the City's Zoning Ordinance. The project's consistency with the City's General Plan elements goals, policies, and objectives is provided in Table 4.10-1, City of Oceanside General Plan Consistency Evaluation (refer to Draft EIR Section 4.10, Land Use and Planning). As outlined in Table 4.10-1 of the Draft EIR and as analyzed throughout the EIR, with approval of the requested density bonus, the project would not conflict with the goals, policies, and objectives of the City's General Plan, including the City's General Plan's land use designation of Single Family Detached Residential (SFD-R) for the project site and zoning designation of Single-Family Residential – Scenic Park Overlay and Equestrian Overlay (RS-SP-EQ). Please refer also to Response to Comment O5-5 for further discussion on proposed waiver of Equestrian Development Standards.

I2-9 The commenter asserts that the Draft EIR falsely states that the area has been graded appropriately. The commenter asserts that the only thing that ever happened on that property was weed removal and there was no preparation of soil, grading etc. In response, the Draft EIR states that the project site's southern portion has been previously disturbed and graded (Draft EIR, p. ES-2), consistent with the project site's history per historical aerial photographs. Dudek conducted an online review of historical aerial photographs of the project site which demonstrated that the area of potential effect (APE), which

includes the entire project site, has undergone grading within the southern half of the APE (Draft EIR, p. 4.4-3). More recently, brush clearing and other general maintenance has occurred within the site. Furthermore, as outlined in Section 3.2.6 of the Draft EIR, Construction Phasing and Conceptual Grading, the 9.86-acre development footprint would be graded as part of project implementation. See also, Draft EIR Section 4.2, Air Quality, and Table 4.2-6, identifying proposed grading activities during construction. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I2-10 The commenter seems to express concern that high school traffic on Guajome Lake Road was not included in the project traffic analysis. See Response to Comment I2-5, which explains traffic congestion is not a CEQA impact. In any event, the project's LTA provides the average daily trip (ADT) count that was collected along Guajome Lake Road for a period of 24 hours which includes both day and night time, on a typical school day in April 2022. A review of ADT shows that even with higher traffic during the AM and mid-day, the daily traffic demand on the roadway does not exceed its capacity under Existing or Cumulative conditions without and with the project traffic.

I2-11 The commenter requests a meeting with all parties to discuss the project in 2025. Refer to Response to Comment I2-3 above regarding previous and future meetings related to the project EIR.

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Comment Letter I3

Robert Dmohowski

From: Mari Imaeda <mariimaeda@yahoo.com>
Sent: Tuesday, December 31, 2024 7:41 PM
To: Robert Dmohowski
Subject: MI-2024.12.31 - Guajome Park Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mr. Dmohowski,

I am writing to you to express my objections to the current proposed plan for Guajome Park residential housing project. I3-1

(1) City of Oceanside, as well as many who work in Oceanside, are eager to have affordable housing in Oceanside. However, of the 83 houses that are proposed only 4 are planned as affordable housing. As we had seen in the past housing projects they mostly benefits the investors, who can afford/finance to buy and rent out at high rents with little or no risk. I believe that the city is not addressing the real issue that many people, who work in Oceanside, cannot afford the houses that are offered to them. I3-2

(2) In the dEIR many endangered species were found. The developer should do more to avoid the destruction of our Oceanside's unique nature heritage. I3-3

I do not agree with the developer that these are minor issues that can be mitigated. I3-4

Yours sincerely,
Dr. Mari Imaeda.

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Response to Comment Letter I3

Individual
Mari Imaeda
December 31, 2024

I3-1 The commenter begins their letter with introductory remarks and expresses general opposition for the project. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I3-2 The commenter expresses dissatisfaction over the number of affordable housing units included in the project and feels that the City is not addressing a larger issue of affordable homes in the City. As discussed in Draft EIR Chapter 3, Project Description, four of the proposed 83 single-family homes (5% of the total) would be designated as deed-restricted affordable housing and the remaining 79 homes would be sold at market rate. As discussed in Draft EIR Section 4.10, Land Use and Planning, the proposed dwelling unit distribution complies with the City of Oceanside Inclusionary Housing Ordinance requirements and the provisions of the Density Bonus Law regarding affordable housing. The project would provide 5% of the units as affordable to very-low-income households and would pay the remaining 5% of the City's 10% Inclusionary Housing obligation through an in-lieu fee. Note that the project is subject to the City's Inclusionary Housing obligation percentage (10%) in place at the time the project's Senate Bill (SB) 330 application was filed in June 2022 per Chapter 14C, Inclusionary Housing, of the City's Code of Ordinances. This comment does not raise any issues related to the adequacy of the Draft EIR. Therefore, no further response is required.

I3-3 The commenter suggests that the developer do more to avoid destruction of Oceanside's nature heritage, particularly in regard to endangered species discussed in the Draft EIR. In response, Draft EIR Section 4.3, Biological Resources, analyzed potential impacts of the project on biological resources and the implementation of mitigation measures Mitigation Measure (MM)-BIO-1 through MM-BIO-11 to reduce potential impacts to special-status species to a less than significant level. Additionally, the project would avoid development in the northernmost portion of the site, which includes the riparian corridor, thereby preserving approximately 6.92 acres of the 16.78-acre site as open space. All residential development would be concentrated on the southern portion of the site, which has already been graded and disturbed. This comment does not raise any issues related to the adequacy of the Draft EIR. No further response is necessary.

I3-4 The commenter states that these are not minor issues that can be mitigated. Please refer to Responses to Comments I3-2 and I3-3 above. This comment does not raise any issues related to the adequacy of the Draft EIR. Therefore, no further response is required. No further response is necessary.

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Comment Letter I4

Robert Dmohowski

From: Thomas Kounnas <tomkounnas@yahoo.com>
Sent: Saturday, January 4, 2025 8:58 PM
To: Robert Dmohowski
Subject: Guajome Lake Road opposition

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Hi,

I am a resident of Park Lake off of North Santa Fe and Oceanside and I'm asking you to oppose the new housing development on Guajome Lake Road for
Multiple reasons including the following: I4-1

- Traffic - Per the dEIR, the project will generate 830 average daily vehicle trips (10 trips per day x 83 dwelling units). I4-2
- There is no nearby public transit (This is definitely not the "smart growth" the City claims to support!) The closest bus stop is along N. Santa Fe Ave., over 1 mile away. I4-3
- Safety - Increased congestion will impact fire evacuation routes. It will also reduce pedestrian safety. Safety measures for pedestrians crossing Guajome Lake Road must be included. I4-4
- Air quality - Hundreds of additional vehicle trips on a dirt road will negatively impact our air quality. I4-5
- There is a high potential of sensitive paleontological resources on site. I4-6

I appreciate your consideration. Thank you! I4-7

Tom

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Response to Comment Letter I4

Individual
Thomas Kounnas
January 4, 2025

I4-1 The commenter begins their letter with introductory remarks and expresses general opposition for the project. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I4-2 The commenter states information from the Draft EIR that the project would generate 830 average daily vehicle trips. This comment restates information contained in the Draft EIR and does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I4-3 The commenter has expressed concern that the project lacks nearby public transit, which they feel is inconsistent with the "Smart Growth" principles supported by the City. The project is located just outside of a designated transit priority area/Smart Growth Opportunity Area and is not required to fully adhere to Smart Growth principles. However, the project does incorporate design features that align with these principles, including sidewalk improvements described in Draft EIR Chapter 3, Project Description. The project site is designated for single-family residential in the City's General Plan and zoned for residential development.

I4-4 The commenter states that increased congestion would impact fire evacuation routes and pedestrian safety. The commenter also requests safety measures for pedestrians crossing Guajome Lake Road. The project would provide two access points for emergency responders along the southern boundaries of the project site along Guajome Lake Road. The project site access, including proposed road widths and connectivity, will comply with the City's roadway standards and California Fire Code (CFC) Section 503, including the looped internal road system designed to accommodate emergency vehicle access and residential traffic flow. The project is also consistent with Section D107.1 of the CFC, which addresses fire apparatus access roads for residential developments with one- or two-family dwellings, Section D107.1 states that developments with more than 30 dwelling units shall be provided with two separate access roads, unless certain exceptions apply (i.e. .when there are more than 30 dwelling units accessed from a single public or private fire apparatus access road and all dwelling units have an approved automatic sprinkler system). Consistent with Section D107.1 of the CFC, the project proposes two access points into and out of the development accessible via Guajome Lake Road and the project's proposed looped internal road system has been designed to accommodate emergency vehicle access and residential traffic flow. Furthermore, the nearest evacuation routes to the project site are Oceanside Boulevard and College Boulevard. Currently, Guajome Lake Road is an unpaved dirt road from Albright Street to just east of Old County Road. This area is currently not up to fire code standards, but as discussed in Draft EIR Chapter 3, Project Description, project implementation would include improvements along a portion of Guajome Lake Road (from Albright Road to the eastern edge of the project frontage, approximately 1,200 linear feet) to comply with City roadway and fire code standards. Because the project site and surrounding area are not located within a Very High Fire Hazard Severity Zone, an evacuation plan is not required. However, in the event of an emergency that requires evacuation, the event would be managed with the City's Genasys evacuation management software used to meter traffic combined with downstream intersection control to move traffic. In addition, the project would be required to implement a traffic control plan for construction activity in the public right-

of-way to insure proper emergency access to the project site and surrounding area during project construction. The remainder of the project would not require the full closure of any public or private streets or roadways during construction or operations and would not impede access of emergency vehicles to the project site or any surrounding areas. Further, the project would provide all required emergency access in accordance with the requirements of the Oceanside Fire Department, as detailed in Draft EIR Draft EIR Sections 4.13, Public Services, and 4.15, Traffic and Circulation. In regard to concerns related to pedestrians crossing Guajome Lake Road, please refer to Response to Comment A2-13 above. A sidewalk along the project frontage of Guajome Lake Road and just west of the project site to Albright Street is proposed that would improve pedestrian connectivity along this road. For further discussion of road and pedestrian improvements and traffic safety, refer to Responses to Comments I1-2 and I1-3 above.

I4-5 The commenter expresses concern that additional vehicle trips on the dirt road would negatively impact air quality. Refer to Response to Comment I2-5 above.

I4-6 The commenter points out that there is a high potential for sensitive paleontological resources on site. This is recognized within Draft EIR Section 4.6, Geology and Soils, which states "based on the survey and records search results, map, and literature review, the project site has high potential to produce paleontological resources during planned construction activities in areas underlain by Eocene deposits and Holocene deposits at depth" (Draft EIR, p. 4.6-10) and the Draft EIR includes mitigation measure (MM)-GEO-1 to reduce potential impacts to paleontological resources to less than significant. Further, Draft EIR Section 4.6 reports that no paleontological resources were observed during the pedestrian survey and no paleontological resources were identified within the project site as a result of the institutional records search, desktop geological review, and paleontological survey. The commenter does not provide any information that conflicts with paleontological findings discussed in Section 4.6 of the Draft EIR. No further response is required.

I4-7 The commenter ends their letter with conclusory remarks. No response is required.

Comment Letter I5

Robert Dmohowski

From: Stephanie Briones <smbriones@gmail.com>
Sent: Monday, January 6, 2025 11:03 AM
To: Robert Dmohowski
Subject: Guajome housing project concerns

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Rob,

I hope this new year finds you well. I recently learned about the proposed Guajome housing project, and I am writing to share my concerns about its impacts on sensitive bird species, particularly the Coastal California Gnatcatcher. This federally threatened species relies on the habitat within the project site for survival, including confirmed nesting activity. Building in this area would cause irreparable harm to the Gnatcatcher population and other vulnerable species such as the federally endangered Least Bell's Vireo and the fully protected White-tailed Kite.

This habitat is not only critical for these species' survival but also part of a broader ecosystem that deserves our stewardship. I hope that you and your team will carefully consider the long-term consequences of this project and will seek alternatives that preserve these essential habitats for the sake of biodiversity and conservation.

Thank you for your attention to this matter.

Sincerely,
Stephanie Briones

I5-1

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Response to Comment Letter I5

Individual
Stephanie Briones
January 6, 2025

I5-1 The commenter expresses concern about the project's impact on sensitive bird species and associated critical habitat and requests alternatives to the project that preserve habitat. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. A detailed analysis is provided in Draft EIR Section 4.3, Biological Resources, and Appendix C, Biological Technical Report, where potential direct and/or indirect significant impacts of the project to vegetation communities, special status wildlife species, potential jurisdictional resources, and wildlife corridors/habitat linkages were assessed and minimization and mitigation measures (MM-BIO-1 through MM-BIO-11) identified for implementation to reduce potential direct and indirect impacts to less than significant. Specifically, the Draft EIR explains:

> The proposed project would not result in the direct loss of any riparian habitat that is known to support least Bell's vireo or white-tailed kite but would result in the permanent loss of 1.25 acres of habitat utilized by coastal California gnatcatcher and 8.29 acres of potential foraging habitat for white-tailed kite (Impact BIO-2). Direct impacts to this habitat would be mitigation through implementation of MM-BIO-1, which would provide for the preservation of high-value habitat at a conservation bank (Draft EIR, p. 4.3-19).
>
> To further ensure that special-status wildlife are not impacted by initial clearing/grubbing, MM-BIO-3 through MM-BIO-10 would be implemented, which would involve temporary construction fencing, environmental awareness training, breeding season avoidance, best management practices for construction, and nesting bird surveys and avoidance measures. Because the Oceanside Subarea has not be adopted, take of habitat for coastal California gnatcatcher would need to be granted through the Section 10 consultation process with the U.S. Fish and Wildlife Service (MM-BIO-11). Implementation of MM-BIO-1 through MM-BIO-11 would reduce impacts to special-status species, and impacts would be less than significant with mitigation incorporated (Draft EIR, p. 4.3-19 [emphasis removed]).

In regard to alternatives to the project that preserve habitat, please refer to Responses to Comments A3-9 and A3-10 above.

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Comment Letter I6

Robert Dmohowski

From: Rick Winfrey <rick.winfrey@gmail.com>
Sent: Monday, January 6, 2025 12:28 PM
To: Robert Dmohowski
Subject: Concern about the proposed Guajome Park housing development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Rob,

I am writing to express my strong opposition to the proposed housing development near Guajome Park. While I understand and empathize with the housing development goals for Oceanside and more broadly for the state of California, I unfortunately must oppose this project due to the risks it imposes on critical habitats, including 1.25 acres designated as a hardline preserve for the federally threatened Coastal California Gnatcatcher, where breeding has already been confirmed at the proposed development site. Additional impacts include permanent harm to 8+ acres of foraging habitat for the fully protected White-tailed Kite raptor, and threats to the federally endangered Least Bell's Vireo bird species, which nests nearby. The proximity of this project to Guajome Park significantly jeopardizes a vital wildlife corridor between the park and its Lake and the San Luis Rey River that would permanently harm migratory routes for species like bobcats and coyotes that are crucial for our native ecologies to thrive. Moreover, the proposed housing development introduces severe risks of pollution via runoff to the downstream creeks leading to Guajome Lake, further endangering the hundreds of species of native plants and animals dependent on these waterways. In addition to these ecological concerns, this proposed development contradicts the area's cultural and scenic preservation standards, and risks public safety by increasing traffic density and impeded first-responder and evacuation routes. Given these risks, I urge the City to prioritize conservation, safety, and sustainable planning by rejecting this development, and instead locate an area more suitable for a housing development that does not present such a threat to our native ecologies and existing infrastructure capacity.

I6-1

I6-2

Sincerely,
Rick Winfrey

Homeowner
803 Wala Dr.
Oceanside, CA 92058

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Response to Comment Letter I6

Individual
Rick Winfrey
January 6, 2025

I6-1 The commenter expresses opposition to the proposed project due to risks it imposes on sensitive species and their habitat onsite and concerns related to the impact of project development on wildlife corridors associated with the adjacent Guajome Regional Park and migratory routes for native species. The commenter identifies coastal California gnatcatcher as federally threatened, and notes that the Biological Technical Report prepared in support of the EIR states it was observed onsite. The commenter identifies Least Bell's vireo as federally endangered and nests nearby. The commenter identifies white-tailed kite as fully protected, notes that the Biological Technical Report prepared in support of the EIR states it was observed onsite, and notes that the project would result in permanent impacts to biological resources, which received extensive analysis in the Draft EIR. It does not raise any specific issue regarding that analysis.

For discussion related to project impacts on sensitive species and associated habitat, refer to Comments A3-12 and A3-14 regarding mitigation for impacts to coastal California gnatcatcher. Please refer to Response to Comment A3-43, addressing potential impacts to white-tailed kite and associated habitat. Draft EIR Section 4.3 addresses the white-tailed kite and identifies mitigation measures to reduce impacts to special-status wildlife species to less than significant (Draft EIR, p. 4.3-19). This includes mitigation measures to be implemented during construction to minimize impacts to bird species and Mitigation Measure (MM)-BIO-1, which requires offsite mitigation for the loss of foraging habitat. Refer also to Response to Comment A3-15, addressing potential impacts to riparian habitat, which the Draft EIR acknowledges has potential to support nesting and foraging for least bell's vireo (Draft EIR, p. 4.3-9). In addition, project implementation of mitigation measures (MM-BIO-2 and MM-BIO-6) would ensure that impacts to riparian habitat would be reduced to a level of less than significant (Draft EIR, p. 4.3-21).

Finally, please refer to Responses to Comments A3-15 through A3-17 regarding potential impacts to wildlife corridors or migratory routes, and response to I5-1 regarding coastal California gnatcatcher, least Bell's vireo, or white-tailed kite. The commenter is also referred to analysis on p. 4.3-21 of the Draft EIR Section 4.3, Biological Resources, and more generally to that EIR chapter. This comment does not identify any inadequacies with the analysis and mitigation measures and no further response is required.

To the extent the comment addresses hardline preserve zones as defined within the Subarea Plan, note also that, as discussed in Section 2.3 of the Draft EIR, the Subarea Plan has been prepared and is used as a guidance document for development projects in the City, but it has not been approved or permitted. Although the Subarea Plan is not approved, the City encourages project applicants to abide by the guiding principles of the plan when designing projects, including the avoidance of designated preserve areas. However, the Subarea Plan does acknowledge that areas of designated preserve can overlap with private ownership; therefore, the boundaries of the preserve may be revised on a project-by-project basis (Draft EIR, p. 4.3-10). The northern portion of the project site overlaps with a hardline preserve zone as defined within the Subarea Plan. However, contrary to the comment, only 0.03 acres of the proposed project would overlap with this area identified in the Subarea Plan. The project

proposes to modify the current proposed preserve boundary to conform with the site design, preserving everything to the northeast of the proposed project and existing development as shown on Figure 3 in Appendix C, Biological Technical Report. The design of the project would ensure that the general location, acreage, and vegetation originally planned for preservation in the Subarea Plan would remain with implementation of the proposed project (Draft EIR, p. 4.3-23).

I6-2 The commenter expresses concern over the possible risks of pollution via runoff to the downstream creeks leading to Guajome Lake and potential to impact plant and animal species dependent on the waterways. In response, the project would implement comprehensive erosion control measures to minimize these risks. As discussed in Draft EIR Section 4.9, Hydrology and Water Quality, adherence to the City's Grading Ordinance and the use of best management practices (BMPs) outlined in the stormwater pollution prevention plan (SWPPP) would prevent erosion impacts. Additionally, the proposed landscaping throughout the project site would further stabilize soil, reducing erosion compared to the existing condition and as required by mitigation measure MM-BIO-3, would not "use plants that require intensive irrigation, fertilizers, or pesticides adjacent to the Preserve" and water runoff from landscaped areas would be directed away from the open space areas and contained and/or treated within the development footprint. Landscaping within the Subarea Plan buffers would also consist of native species. The project would also comply with the National Pollutant Discharge Elimination System State Water Resources Control Board Construction General Permit (Order No. 2022-0057-DWQ), which mandates the preparation of a SWPPP specifying BMPs to minimize water quality impacts during construction. These include proper handling of hazardous materials, regular cleaning of construction areas, and the use of BMPs such as oil and grease absorbent filters at storm drain inlets and peak-flow reduction features like grass swales. Adherence to stormwater requirements would also include implementation of two biofiltration basins on the project site to provide onsite stormwater treatment for pollutants that could otherwise be discharged from the development site. The project would be required to provide implementation and ongoing maintenance of these treatment control features in accordance with the Storm Water Quality Management Plan (SWQMP). Furthermore, the project is required to maintain structural stormwater BMPs in accordance with the SWQMP Operations and Maintenance Plan and to provide documentation of annual maintenance verification to the City as required by the Regional MS4 Permit. Compliance with these measures would ensure that potential impacts to water quality and downstream habitats remain less than significant. In addition, please refer to Response to Comment A2-19 above.

The comment also states the project contradicts the areas cultural and scenic preservation standards and risks public safety by increasing traffic and impeding first responder and evacuation routes. The comment asks for the project to be relocated. Refer to responses to comments I1-2, I1-3, I2-2 through I2-5, and I4-4, which discuss the project's compliance with scenic standards, its minimal impact to traffic (which is also not a CEQA impact), and that the project is designed to ensure adequate emergency access and evacuation routes. As it concerns cultural impacts, Sections 4.4 and 4.16 of the Draft EIR evaluated impacts to cultural and tribal cultural resources, concluding impacts would be less than significant with mitigation incorporated. As the comment raises no issues with this analysis, no further response can be provided or is required. The comment will be included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

Comment Letter I7

1

Serious Concerns with the proposed Guajome Lake Homes Project.

(the Project)

The Project is not in accordance with Fire Safe practices, relies too much on an HOA for important safety issues, lacks a clear understanding of Fire-safe vegetation and will be an undesirable source of nitrates, phosphates, and other nutrients for the surrounding area and Guajome Lake.

I7-1

Both the location of the Project as well as the proposed high density of homes are the root cause of these concerns.

Issues to be addressed:

1. The Project must be designed to bring it into compliance with Zone 1 = 30 feet and Zone 2= 100 feet guidelines for the entire development. I7-2
2. The Project should provide an accurate/reliable list of plants that should be avoided as well as plants that should be used. I7-3
3. In the Fire safety topic, there seems to be unreasonable dependence on the HOA and homeowners to be knowledgeable and diligent with the Fire Safe vegetation and landscaping. The Project needs to propose a solution to reduce this dependance. I7-4
4. Table 3 of the DEIR calls for the HOA to be responsible for the vegetation and irrigation of Zone 1. This would include the homeowner's private lots. This is simply not practical. I7-5
5. Fire Behavior models- Behave Plus- the Project should provide an analysis using models that avoids the limitations of BeHave Plus. I7-6

6. Additional Home-hardening measures need to be included on the topic of wooden structures near the homes. I7-7
7. The site-wide Stormwater system must be designed to avoid nutrients from the homes entering the nearby areas, creeks, and Guajome Lake. I7-8
8. Some mitigation should be considered to ensure the health of Guajome Lake and nearby areas. This could, for example, involve a real-time system for monitoring pollutants and nutrients coming from the Project as well as monitoring water quality, dissolved oxygen, and pH of the Guajome Lake. I7-9

Fire Safety:

In Oceanside, it is essential to provide housing projects that meet or exceed the recommendations of Fire Safety experts such as Oceanside Fire Department (OFD), CAL FIRE, NFPA, and NFSC. One of the most important components is the Zone 0, Zone 1, Zone 2 concept. This is a proven system that leads to successful Fire Safe communities. It is unbelievable that a project in Southern California in 2025 would be proposed without rigorously following this. The project describes the nearby areas as being maintained by some other entity, or that "improved vegetation" will be utilized in the less than 100 feet Zone 2 parts of the project. **This is not a stable or safe situation** and is an unacceptable risk for the community.[1] I7-10

Vegetation- One "remedy" to the less-than-adequate Fire safety proposed by the Project is a description of "Forbidden Plants" . Somehow the HOA will be responsible for this to be followed. HOA boards do not have the required expertise to do this. The list of "Forbidden Plants" actually contains 6 plant species that are recommended by CAL FIRE as Fire-safe. The concept of a list that will contain all undesirable (non Fire-safe) plants is ridiculous- you could not list them all. **So,** I7-11

right from the start the process is confusing. Also note that the Project does not provide a list of acceptable or desired Fire-safe plant species.

I7-11 Cont.

Fire Models. The BeHave Plus model used in the DEIR has several limitations that are important to the current case. It is best used as a short-term fire prediction model, uses a simplified model for fuels, does not adequately account for changing weather patterns, and ignores the importance of wind-channelling on fire spread. **The Project should consider using more sophisticated models** [2]

I7-12

Home-hardening. It is true that the area is currently not in CAL FIRE's Very High Fire Severity Zone (VHFSZ). But with changing climate conditions, lower humidity, strong winds it is likey **this area will someday be in a VHFSZ**. To anticipate this, in addition to the measures proposed in the DEIR, the following should be added: [3].

1. No wooden structures physically attached to the homes, such as decks and balconies.
2. No wooden fences near the homes such as redwood fences. All fencing should be non-flammable.
3. Examples of non-combustible materials include decks made with wood-plastic composites, higher density tropical hardwood, or fire retardant treated decking materials, and fences that use metal or masonry where attached directly to the siding of a home

I7-13

Stormwater Management:

The weakness in the Stormwater plan involves the **likely flow of nutrients into nearby sensitive areas, creeks, and Lake Guajome**. These nutrients will drastically change the wildlife balance and encourage non-native, invasive species– hence changing the entire food-chain and biodiversity.

I7-14

4

Nitrates and phosphates, while essential nutrients for plant growth, can have significant negative impacts on freshwater wildlife areas when present in excess. Excess nitrates and phosphates can set off a chain reaction in the ecosystem: [4]
1. Excess nutrients lead to rapid growth of algae and aquatic plants.

2. As these plants die and decompose, bacteria consume large amounts of dissolved oxygen in the water, creating "dead zones" where fish and other aquatic life cannot survive.

3. The creation of dense blooms of noxious, foul-smelling organisms that reduce water clarity and harm water quality, thus blocking sunlight from reaching deeper waters, hindering the growth of submerged plants.

It may be possible that a well-designed Zone 2 region will not need continuing nutrients (fertilizer). However experience has taught us that Landscapers often resort to using herbicides, anti-fungal, and other treatments to maintain the desired plants in Zone 2. Two examples: Tamarisk (Salt Cedar) and Pampas Grass- in both these cases, plant removal is very difficult (extremely deep-root plants) and herbicides are used. Both these plants represent a serious Fire hazard so controlling them is essential.

Zone 1 (lawns, irrigation, ornamental plants, etc): This Zone is controlled by the homeowners and is very difficult to control/monitor what happens. As before, expecting the HOA to control the types of trees/plants and how they are cared for in these areas is unreasonable. There will also be a number of undesired nutrients flowing off-site from the Zone 1 areas. This can include pesticides, herbicides, animal waste, gardening waste, and auto waste. Some enhancement to the proposed Stormwater system is needed to control these materials and prevent irreversible changes to the local wildlife and environment. The Project should also

I7-14 Cont.

include some measures to monitor the flow of such materials into the nearby areas as well as the resultant water quality effects on Guajome Lake. I7-14 Cont.

Michael Tenhover (Tenhover@protonmail.com)
873 Wala Drive
OCN, CA 92058

References:

[1]
a. City of Oceanside Nuisance Vegetation and Waste Clearance Standards (2019)
b. CAL FIRE Wildfire Action Plan (2024)
c. San Diego County Consolidated Fire Code (2020)

[2]
a. Standard Fire Behavior Fuel Models: A Comprehensive Set for Use wot Rotermal's Surface Fire Spread Model General Technical Report RMRS-GTR-153. USDA
b. Nomographs for estimating surface fire behavior characteristics. General Technical Report RMRS-GTR-192. Fort Collins, CO: USDA
c. Behave: Fire Behavior Prediction and Fuel Modeling. General Technical Report INT-194 USDA
d. Review of Methods for Developing Probabilistic Risk Assessments: Modeling Fire General Technical Report PNW-GTR-802.
e. Missing Climate Feedbacks in Fire Models: Limitations and Uncertainties in Fuel Loadings and the Role of Decomposition in Fine Fuel Accumulation Erin J. Hanan, Maureen C. Kennedy, Jianning Ren, Morris C. Johnson, Alistair M. S. Smith. Journal of Modeling Earth's Systems

[3]
a. NFPA- National Fire Prevention Association: https://www.nfpa.org/

[4]
a. US EPA: https://www.epa.gov/caddis/nutrients
b. Eutrophication: Causes, Consequences, and Controls in Aquatic Ecosystems. Michael F. Chislock et al Nature Education Knowledge 4(4):10

I7-15

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Response to Comment Letter I7

Individual
Dr. Michael Tehhover
January 7, 2025

I7-1 The comment provides an introductory remark that states the project is not in accordance with fire safe practices, relies too heavily on the Home Owners Association (HOA) for important safety issues, lacks an understanding of fire-safe vegetation, and proposes fire-safe vegetation that will be an undesirable source of nitrates, phosphates, and other nutrients for the surrounding area and Guajome Lake. The commenter expresses project-related fire and safety concerns for the proposed development and surrounding homes. The comment is acknowledged as an introduction to more specific comments that follow. These concerns are detailed in the remainder of the comment letter; please refer to Letter I7 responses to comments below. In regard to concerns about project density, the project would not introduce high-density housing but rather single-family homes that complement the existing residential developments and overall align with the General Plan Land Use Element.

I7-2 The commenter states that the project must be designed to bring it into compliance with the guidelines of having Zone 1 extend 30 feet from each home and Zone 2 extend 100 feet from each home for the entire development. In response, as described in Section 3.2 of Draft EIR Chapter 3, Project Description, two fuel modification zones (FMZs) would extend across the project site. This defensible space comprises an irrigated, well-maintained landscape that consists of fire-resistant plants within FMZ Zone 1 and a thinned landscape in FMZ Zone 2. The FMZs requirements are outlined in Section 3.11.2 of Appendix O, Fire Protection Plan Letter Report. Based on the predicted fire intensity and duration, along with flame lengths for this project site and the provided FMZs, the highest fire concern is considered to be from firebrands or embers as a principal ignition factor. Therefore, the project site, based on location and ember potential, is required to include the latest ignition- and ember-resistant construction materials and methods for roof assemblies, walls, vents, windows, and appendages, as mandated by the California Building Code (Chapter 7A). Additionally, a space extending 5 feet on a horizontal plane from the exterior wall surface of the buildings shall consist of continuous hardscape or limited fire-resistant plantings acceptable to the Fire Authority Having Jurisdiction (FAHJ). Vegetation in this space would not exceed 6 inches to 18 inches in height, and irrigation is required. Additionally, this space would be free of combustible materials, and the use of mulch is prohibited (Appendix O).

As discussed in Draft EIR Chapter 3, it is acknowledged that the FMZs proposed for portions of this project are not standard Oceanside Fire Department (OFD) widths, as some areas include reduced Zone 1 and/or Zone 2 areas and the total FMZ width within the property boundaries is less than 100 feet in some places. The reduced width is due to constraints such as grading extents, portions of the FMZs extending into riparian forest protected areas, residential lot lines, or property boundaries. Draft EIR page 4.18-9 explains that "FMZs are typically designed to gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones and irrigated zones adjacent to each other on the perimeter of the structures exposed to the WUI. The project is proposing a site-specific FMZ program with additional measures that are consistent with the intent of the standards." Thus, the EIR concludes that the proposed FMZ widths, along with other measures incorporated in the project design, are sufficient to ensure that the project would have a less than significant effect related to wildfire risk. Appendix O explains that "the adequacy of the provided FMZ widths is based on a variety of analysis criteria including predicted flame length, fire

intensity (BTUs) and duration, site topography, extreme weather, position of structures on pads, position of roadways, adjacent fuels, and type of construction" (Draft EIR Appendix O, p. 24). The fire behavior modeling analysis presented in Appendix O found that the proposed FMZs are "approximately 2.5-times the flame length of the worst-case fire scenario under peak weather conditions and would provide adequate defensible space" in the event that a wildfire approaches the Project site (Draft EIR Appendix O, p. 33). In other words, by creating an area of reduced vegetation, the proposed FMZs would slow the spread of wildfire. The additional measures incorporated in the project design are described in Appendix O as follows:

- Each residential structure within the project would be ignition resistant and fully fire sprinklered in compliance with applicable portions of the City's Municipal Code, Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code, and Section 337 of the California Residential Code;
- For those lots where the total FMZ width is less than 100 feet and/or the lot is adjacent to naturally vegetated coastal sage scrub habitat in the northern portion of the site, windows facing the FMZ and/or the coastal sage scrub habitat shall be dual pane dual tempered windows and an additional layer of 1-hour fire rated 5/8-inch gypsum drywall shall be installed on the building's exterior; and
- The HOA and individual homeowners will be required to implement a vegetation maintenance program as described in Appendix O.

For clarity within the EIR, these fire-related project design features have been added to Draft EIR Chapter 3, Project Description, and Draft EIR Section 4.18, Wildfire, and text in Appendix O has been revised to clarify that the identified code-exceeding measures have been incorporated in the project as project design features. These text additions and revisions are shown in ~~strikeout~~/underline for Draft EIR Section 3.2.5, Project Design Features, Draft EIR Section 4.18, and Appendix O (refer to Chapter 3, Errata, of the Final EIR). Additionally, Figure 4 of Appendix O, of the Draft EIR, has been revised to depict the extent of the proposed FMZs (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR) Final plans would be reviewed and approved by OFD to ensure that all safety requirements are met and that the project remains compliant with fire protection standards.

I7-3 The commenter states that the project should provide an accurate and reliable list of plants that should be avoided as well as plants that should be used. In response, as described within Section 3.11.2 of Appendix O, Fire Protection Plan Letter Report (under number 3), "the Building Official and OFD may provide a list of prohibited and recommended plants. This FPP [Fire Protection Plan] includes a proposed list of Prohibited Plants that is included as Attachment D of the Fire Protection Plan." The addition of plant material to the approved list will ultimately be at the discretion of OFD. However, revisions to Appendix O have been made to include a more robust plant list, the San Diego County Fire Protection District's Acceptable and Prohibited Plant list, to replace Attachment D in Appendix O. These text revisions to Appendix O are shown in ~~strikeout~~/underline (refer to Chapter 3, Errata, of the Final EIR). Please also refer to Response to Comment I7-2 above.

I7-4 The commenter suggests there is an unreasonable dependence on the HOA and homeowners to be knowledgeable and diligent regarding Fire Safe vegetation and landscaping. In response, it is very common and effective for HOAs and individual homeowners to share responsibility for vegetation management, particularly in fire zones, as they are required to maintain "defensible space" around their properties by clearing brush and trimming trees to minimize wildfire risks. HOAs typically manage

vegetation in common areas while individual homeowners manage their own yards, all adhering to local fire safety regulations. Implementation of a vegetation maintenance program as described in Section 3.14 of Appendix O has been added to Draft EIR Chapter 3, Project Description, as a project design feature, as noted in Response to Comment I7-2. Although the HOA and individual lot owners would be responsible for maintaining the FMZs throughout the site, the City of Oceanside Code Enforcement Division, in coordination with the OFD, would inspect and enforce brush hazard code requirements. All tall grass, weeds, and dead vegetation are fire hazards and would be cleared in accordance with the requirements outlined in the City's Nuisance Vegetation and Waste Clearance Standards. The HOA would retain a qualified WUI FMZ inspector who will assess maintenance of the FMZs and prepare a report for submittal to the OFD. All homeowners would sign acknowledgement of maintenance requirements and the HOA would include language in the covenants, conventions, and restrictions (CC&Rs) outlining these restrictions. The OFD's enforcement along with the Code Enforcement Division would send notice to the HOA and/or homeowners if they fail to maintain their individual properties or community areas. Section 3.14 of Appendix O has been updated to better clarify the responsibilities of the HOA and individual lot owners. Revisions to Appendix O are shown in ~~strikeout~~/underline (refer to Chapter 3, Errata, of the Final EIR).

I7-5 The commenter refers to HOA and homeowner responsibilities for management of Zone 1 areas described in Table 3 of Appendix O and states these responsibilities are not practical. Please refer to Response to Comment I7-4 above for discussion on typical shared responsibilities of HOA's and individual homeowners regarding vegetation management.

I7-6 The commenter states the project should provide an analysis using models that avoid the limitations of BeHave Plus. The BeHave model is widely used and is considered the industry standard for predicting fire behavior on a given landscape. As explained in Appendix O, the Behave model was developed by the U.S. Government in 1984 and has undergone continued research, improvements, and refinement. BehavePlus 6.0 used for this project includes the latest updates incorporating years of research and testing. Numerous studies have been completed testing the validity of the fire behavior models' ability to predict fire behavior given site specific inputs. One of the most successful ways the model has been improved has been through post-wildfire modeling In this type of study, Behave is used to model fire behavior based on pre-fire conditions in an area that recently burned. Real-world fire behavior, documented during the wildfire, can then be compared to the prediction results of Behave and refinements to the fuel models incorporated, retested, and so on. The impact analysis provided in Draft Section 4.18, Wildfire, and associated Appendix O, support the Draft EIR's good faith effort at full disclosure of the project's potentially significant impacts under CEQA related to wildfire impacts based on the best available information. Refer to Response to Comment I7-12 for additional discussion of the use of the BeHave model to evaluate wildfire risk for this project.

I7-7 The commenter states additional home hardening measures included on the topic of wooden structures near homes need to be included. Please refer to Response to Comment I7-2 above. As addressed within Appendix O, all structures within the development are required to meet applicable portions of Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code and code-exceeding measures that provide additional home hardening have been incorporated in the project as project design features. As described on page 4.18-10 of the Draft EIR and Appendix O, a space extending 5 feet on a horizontal plane from the exterior wall surface of the buildings shall consist of continuous hardscape or limited fire-resistant plantings; vegetation in this space would not exceed 6

inches to 18 inches in height; irrigation is required; this space would be free of combustible materials; and the use of mulch is prohibited.

I7-8 The commenter states that the project stormwater system must be designed to avoid nutrients from entering nearby areas and waterways. As discussed in Draft EIR Section 4.9, Hydrology and Water Quality, historic drainage patterns on site would be maintained and stormwater would be controlled with implementation of the project's drainage system that includes water quality treatment measures such as the two biofiltration basins. Project development would be designed and constructed in accordance with the project Storm Water Quality Management Plan (SWQMP) that includes stormwater quality measures to remove pollutants from runoff in compliance with the City's Best Management Practices (BMP) Design Manual and Provision E.3 of the Regional MS4 Permit. As discussed on page 4.9-9, "the project would be required to provide for implementation and ongoing maintenance of these features in accordance with the SWQMP ."In addition, as required by Mitigation Measure (MM)-BIO-2, "landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to the Preserve and water runoff from landscaped areas should be directed away from the open space areas and contained and/or treated within the development footprint. Landscaping within the Subarea Plan buffers will consist of native species." Therefore, with implementation of the required post-construction source control measures and MM-BIO-2, the project would be designed to treat stormwater runoff onsite and would not contribute additional sources of polluted runoff from the project site. Please also refer to I6-2 Response to Comment above for a summary of how the project would be required to avoid runoff impacts.

I7-9 The commenter requests consideration of measures to ensure the health of Guajome Lake and nearby areas. As discussed in Draft EIR Section 4.9.4, Hydrology and Water Quality, the project is required to comply with the National Pollutant Discharge Elimination System State Water Resources Control Board Construction General Permit Order No. 2022-0057-DWQ for stormwater discharges and general construction activities and to incorporate runoff controls and standard BMPs, such as regular cleaning or sweeping of construction areas and impervious area. In compliance with the Construction General Permit Order No 2022-0057-DWQ, a stormwater pollution prevention plan (SWPPP) would be prepared for the project that specifies BMPs that would be implemented during construction to minimize impacts to water quality. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. In addition, as discussed on page 4.9-9 of the Draft EIR, "the project would be required to provide for implementation and ongoing maintenance of these [stormwater control] features in accordance with the SWQMP." Compliance with the General Construction Permit, SWQMP, SWPPP, and post-construction BMPs would ensure construction and operation related impacts to water quality would be less than significant.

I7-10 The commenter summarizes their general understanding of fire safety requirements within Oceanside, the importance of fire zone concepts, and states it would be unbelievable for a project not to follow these requirements rigorously. The commenter states that the proposal to have less than 100 feet of FMZ width onsite and reliance on other entities to maintain nearby vegetation results in an unstable and unsafe situation and an unacceptable risk for the community. Please refer to Response to Comment I7-2 above regarding the FMZ width and additional project design features that will ensure the project has a less than significant impact related to wildfire risk and Response to Comment I7-4 regarding the requirements and procedures for onsite vegetation management. Regarding maintenance of nearby vegetation, Appendix O notes that the properties adjacent to the project site

are large residential lots where fuels have already been reduced and the landscape is maintained, and therefore these areas provide an "equivalent FMZ" (Draft EIR Appendix O, p. 24), meaning that the existing condition of these areas meets the standards and intent of the FMZs and contribute to ensuring adequate fire protection for the project.

I7-11 The commenter expresses concern and confusion related to vegetation that the California Department of Forestry and Fire Protection (CAL FIRE) considers not fire safe and states that the project does not provide a list of acceptable fire-safe plants, and again expresses concern with implementation by the HOA. Please refer to Responses to Comments I7-3 and I7-4 above. As noted therein, the HOA would typically maintain common areas. In addition, the HOA would retain a qualified WUI FMZ inspector who will assess maintenance of the FMZs and prepare a report for submittal to the OFD.

I7-12 The commenter expresses concern that the BeHavePlus model used in the Draft EIR has several limitations that are important to the project. The commenter requests consideration of more sophisticated models and expresses concern that the BeHave model uses a simplified model for fuels and does not adequately account for changing climate, weather conditions, and wind-channeling. In response, the BehavePlus is an industry standard fire behavior modeling tool that runs surface fire spread models. The BehavePlus fire modeling system is a point-based model that calculates fire behavior at a single point, meaning it does not capture variations in fuel conditions or topography across an area. Regarding changing climate, weather and wind effects, all of these conditions would be accounted for in fuel models, fuel moisture measurements, and wind inputs, which are collected through data captured daily by nearby Remote Automatic Weather Stations (RAWS) and downloaded to be used in the BehavePlus software. According to the Remote Automatic Weather Stations website, there are nearly 2,200 interagency RAWS stations strategically located throughout the U.S., which monitor the weather and provide weather data that assist land management agencies with a variety of projects such as monitoring air quality, rating fire danger, and providing information for research applications. Most of the stations owned by the wildland fire agencies are placed in locations where they can monitor fire danger. RAWS units collect, store, and forwards data to a computer system at the National Interagency Fire Center (NIFC) in Boise, Idaho, via the Geostationary Operational Environmental Satellite (GOES). The GOES is operated by the National Oceanic and Atmospheric Administration and the data is automatically forwarded to several other computer systems including the Weather Information Management System (WIMS) and the Western Regional Climate Center in Reno, Nevada. Fire managers use this data to predict fire behavior and monitor fuels; resource managers use the data to monitor environmental conditions (visit https://raws.nifc.gov/about-us). While the BehavePlus software has limitations (as does any model), the fire behavior analysis provided in the Draft EIR uses inputs that assess a worst-case fire scenario based on the relevant fuel and weather data. Please also refer to Response to Comment I7-6 above.

I7-13 The commenter expresses concern that the site will someday be considered a Very High Fire Hazard Severity Zone (VHFSZ) due to climate change and changing weather patterns. The commenter also provides recommended measures for the project to anticipate future climate and weather changes including no wood structures attached to houses and no wood or flammable fencing.

In response, a CEQA impact analyses focus on evaluating the potential environmental conditions of a proposed project at the time the CEQA document is circulated. It would be speculative to assume that the fire hazard severity zoning of the site would change sometime in the future. A new map released by the CAL FIRE on March 24, 2025 does not designate the parcel in either a moderate, high or very

high fire zone (CAL FIRE 2025). As discussed in the Fire Protection Plan Letter Report (included as Appendix O) the project's location is currently designated as a Non-VHFHSZ by CAL FIRE. Fire hazard designations are based on factors such as topography, vegetation, and weather, with more hazardous sites typically characterized by steep terrain, unmaintained fuels/vegetation, and proximity to the WUI. None of these conditions are present on the project site. The project is being constructed with fire concerns at the forefront, including advanced building design features for structures in a very high fire hazard severity zone/WUI area. Refer to Response to Comment I7-2 above for discussion related to fire-related construction requirements and project design features. Refer also to Response to Comment I7-4 which discusses maintenance and inspection responsibilities and procedures to ensure that FMZ vegetation standards are met. The advanced building design features to be incorporated are identified as code-exceeding measures described in Section 4 of Appendix O. Many of these requirements and design features address project operations over time.

For clarity within the EIR, text in Draft EIR Chapter 3, Project Description, and Section 4.18, Wildfire, have been updated to better clarify that the identified code-exceeding measures are Project Design Features. In addition, text has been added to Section 3.11.2, Specific Guajome Crest Fuel Modification Zones, of Appendix O, to clarify the FMZ 0 description (i.e., area located from the exterior wall surface of a building extending 5 feet on a horizontal plane to FMZ 1) and requirements (i.e., continuous hardscape or limited fire-resistant plantings, maximum vegetation height of 6 inches, and use of mulch and other combustible materials is prohibited). These text revisions are shown in ~~strikeout~~/underline in Chapter 3, Errata, of this Final EIR).

I7-14 The commenter expresses concern that the stormwater plan's weakness involves the likely flow of nutrients into nearby sensitive areas and waterways that would change species and ecosystems downstream. The commenter lists some examples of how excess nitrates and phosphates can impact ecosystems and expresses concern that vegetation management in Zone 1 and 2 areas may require use of herbicides and other treatments that would flow offsite. The commenter requests that the proposed stormwater system be enhanced to address these issues. Refer to Responses to Comments I7-8 and I7-9 above.

I7-15 The commenter includes a list of references used for letter preparation. These references have been reviewed for the citations provided as concerns the above comments and are noted. This comment does not raise any issues related to the adequacy of the Draft EIR, and no response is required.

Comment Letter I8

Robert Dmohowski

From: Colleen Balch <mschief14@gmail.com>
Sent: Tuesday, January 7, 2025 1:29 PM
To: Robert Dmohowski
Subject: Guajome Lake Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Hi Rob, First let me refresh your memory regarding my credentials for these comments. I am retired from Carlsbad Fire Dept. I held the rank of Deputy Fire Marshal at time of retirement. My primary duties were to review new construction plans and place fire conditions on plans for the planning dept. I also inspected all the projects I reviewed for code compliance. I8-1

I have a few concerns about the information in the report. There is mention of the Coastal sage needing to be removed for fuel modifications. They state that this will be done in the EIR. I am concerned that the EIR and this document may not require the same things. I8-2

They state that the project has two entrances. However, both access Guajome Lake Road. They are only approximately 200 feet apart which is really only 1 entrance/exit since the evacuating cars will be using the same roadway to access 76 which will be being used by everyone in the area evacuating. I8-3

Increasing the construction standards that they are proposing only works if it is maintained and windows are never left open. During the Harmony grove fire a large number of homes caught fire due to doors and/or windows being left open during evacuation. I worked that fire and can attest to that. I8-4

An NFPA 13D fire sprinkler system is not designed as building protection. It is designed to give people more time to evacuate and for the FD to respond. However they do work well. The developer is using the sprinkler system to mitigate the fuel modification issues. I8-5

As far as reducing the fuel modification areas I would say that the construction standards they are using would offset the concerns as long as they have been maintained. However, again an open window or door negates everything. In addition I don't know that insurance companies would issue fire insurance on any of these homes based on what is happening in the surrounding communities. Insurance companies historically don't care for fire sprinklers. (water damage is all they see) In addition I would recommend having every home have the same fire protection requirements. It will make it easier on staff should someone from this development want to do a remodel in the future. That way all the upgrades being required can be carried over for the remodel and the construction integrity remains intact. I8-6

Would also add to the HOA requirements to have some verbiage restricting out buildings in the yards that do not meet the fire resistive requirements for the home itself. This is a HOA nightmare as they may or may not have someone on the board that understands the construction requirements. They may want to just ban them. I8-7

I also don't see any access to the open space from the development itself. How will they get to the area for weed abatement (zone 1)and maintaining open space (zone 2). This becomes a nightmare as time goes on. Neighbors don't have to let them use their property and typically won't due to liability issues. I8-8

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Also a concern is the fact that I don't see any guest parking. Looks like one section of the loop road is down to 28 feet which means no parking. Same for both entrance/exit roads. This will become a parking nightmare. I8-9

Feel free to use any or all of this information. Call me if you have any questions. My number is 760-519-5374. I8-10

Colleen Balch

2

Page 2 of 2 in Comment Letter I8

Response to Comment Letter I8

Individual
Colleen Balch
January 7, 2025

I8-1 The commenter begins their letter by stating their background with the Carlsbad Fire Department, rank, and associated duties. This comment serves as an introduction to comments that follow. No response is required.

I8-2 The commenter expresses concern that the Draft EIR and "the report" may not have the same requirements related to coastal sage scrub removal for fuel modification. In response, it is assumed the report referred to is Appendix O, Fire Protection Plan Letter Report. The potential removal of coastal sage scrub for fuel modification purposes is discussed in the projects fire protection plan (Appendix O) and biological resources analysis (Draft EIR Section 4.3). Appendix O (p. 2) acknowledges that the project may need to remove some coastal sage scrub to establish a fuel modification zone (FMZ) for fire safety. In Draft EIR Section 4.3, Biological Resources, the analysis acknowledges the permanent loss of sensitive vegetation communities, including coastal sage scrub, that shall be mitigated to less than significant through the creation of coastal sage scrub within an off-site conservation bank, (see Mitigation Measure [MM]-BIO-1 in Section 4.3 of the Draft EIR). Therefore, the Draft EIR and Appendix O are aligned regarding fuel modification.

I8-3 The commenter expresses concern regarding the placement of access driveways along Guajome Lake Road and their use during an evacuation. In response, project site access, including road widths and connectivity, are required to comply with the City's roadway standards and California Fire Code (CFC) Section 503. Regarding concerns related to evacuation and proposed access routes, refer to Response to Comment I4-4 above. Furthermore, the nearest evacuation routes to the project site are Oceanside Boulevard and College Boulevard.

I8-4 The commenter states that the effectiveness of the proposed construction standards depends on proper maintenance and ensuring that windows are never left open. In response, refer to Response to Comment I7-2, which summarizes project compliance with fire resistant construction standards. Fire protection plan project design features were proposed in order to exceed the requirements of Chapter 7A of the California Building Code and provide additional protection for the proposed project, including the structures most vulnerable, exterior side. The commenter is correct where they state that the effectiveness of the proposed construction standards depends on proper maintenance and closed windows. In the unlikely event that a window(s) are left open during an emergency event, part of the Chapter 7A of the California Building Code requirements include the installation of National Fire Protection Association (NFPA) 13-D automatic interior fire sprinkler systems which would be included in the project's design to assist in minimizing fire spread beyond the room of origin. Furthermore, text additions to the Draft EIR have been included within the project's Fire Protection Plan (Appendix O), the community implement an educational wildfire best-practices components, where the Home Owners Association (HOA) will provide the community with an active homeowner educational outreach on its Webpage, at community meetings, and with strategically timed reminders regarding their responsibilities for maintaining their homes, checklists to complete if a wildfire occurs, and general fire awareness and readiness. These wildfire education outreach recommendations would follow the Ready, Set, Go! wildfire ready approach that are included in Section 5 of Appendix O. Revisions to Draft

EIR Chapter 3, Project Description, describing fire protection project design features, and Appendix O, including Section 5 of Appendix O, are shown in ~~strikeout~~/underline (refer to Chapter 3, Errata, of the Final EIR).

I8-5 The commenter states that an NFPA 13D fire sprinkler system is not intended for building protection but is designed to provide additional time for residents to evacuate and for the fire department to respond. The comment also states that the developer is using the sprinkler system to address fuel modification issues, and that they do work well. In response, as outlined in the Fire Protection Plan Letter Report, the NFPA 13D sprinkler system is a requirement of the Oceanside Fire Department (OFD) Code and therefore is not proposed as a mitigation measure. However, the comment that they do work well is accurate. Initially, these systems were used as mitigation measures for building in wildland–urban interface (WUI) areas due to their effectiveness in reducing structural vulnerability to wildfires, and due to successful performance, were ultimately adopted into the code. As the comment does not raise any specific issue regarding the Draft EIR's analysis, no more specific response can be provided or is required.

I8-6 Addressing the reduced fuel modification areas, the comment states that the construction standards proposed would offset these concerns if maintained properly. However, they note that open windows or doors could negate these efforts. The commenter also expresses uncertainty about whether insurance companies would issue fire insurance for these homes, given the current situation in surrounding communities. They mention that insurance companies typically do not favor fire sprinklers due to potential water damage. Additionally, the commenter provides recommendations that all homes have the same fire protection requirements. In response, refer to Responses to Comments I7-4, I8-4 and I8-5. The project would be constructed in compliance with fire resistant construction standards, and FMZ would be subject to implementation and enforcement by the HOA and OFD. It is important to note that insurance concerns are not an environmental issue addressed within the scope of the CEQA. Additionally, the NFPA 13D fire sprinkler system is a requirement of the OFD Code. No further response is required.

I8-7 The commenter recommends adding language to restrict the construction of outbuildings in yards unless they meet the same fire-resistive requirements as the homes. They also mention that it can be a challenge for the HOA to manage because the board members may not always be knowledgeable about construction requirements. As indicated on page 22 of Appendix O, the Fire Protection Plan (FPP) outlines ignition-resistant construction for all structures that will meet and/or exceed the requirements of the OFD Fire Code, including Chapter 7A, ignition-resistant building requirements (see first bullet in Section 3.8, Building Construction). Construction of any outbuildings would fall under the umbrella of "all structures" discussed in the FPP. In regard to HOA management of FPP requirements, please refer to Response to Comment I7-4 above.

I8-8 The commenter expresses concerns regarding access to the open space area for weed abatement in Zone 1 and maintenance in Zone 2. In response, homeowners are responsible for ongoing Zone 1 maintenance in rear yards. The project design includes an unimpeded, all-weather pathway (minimum five feet wide side yard setback requirement) on all sides of the residential structures for firefighter access around the entire perimeter of the structure. Access to Zone 1 and Zone 2 FMZs to the north of the proposed development would be provided via a private access easement located in the northeastern portion of the proposed development between Lot 31 and 32, and between Lot 34 and

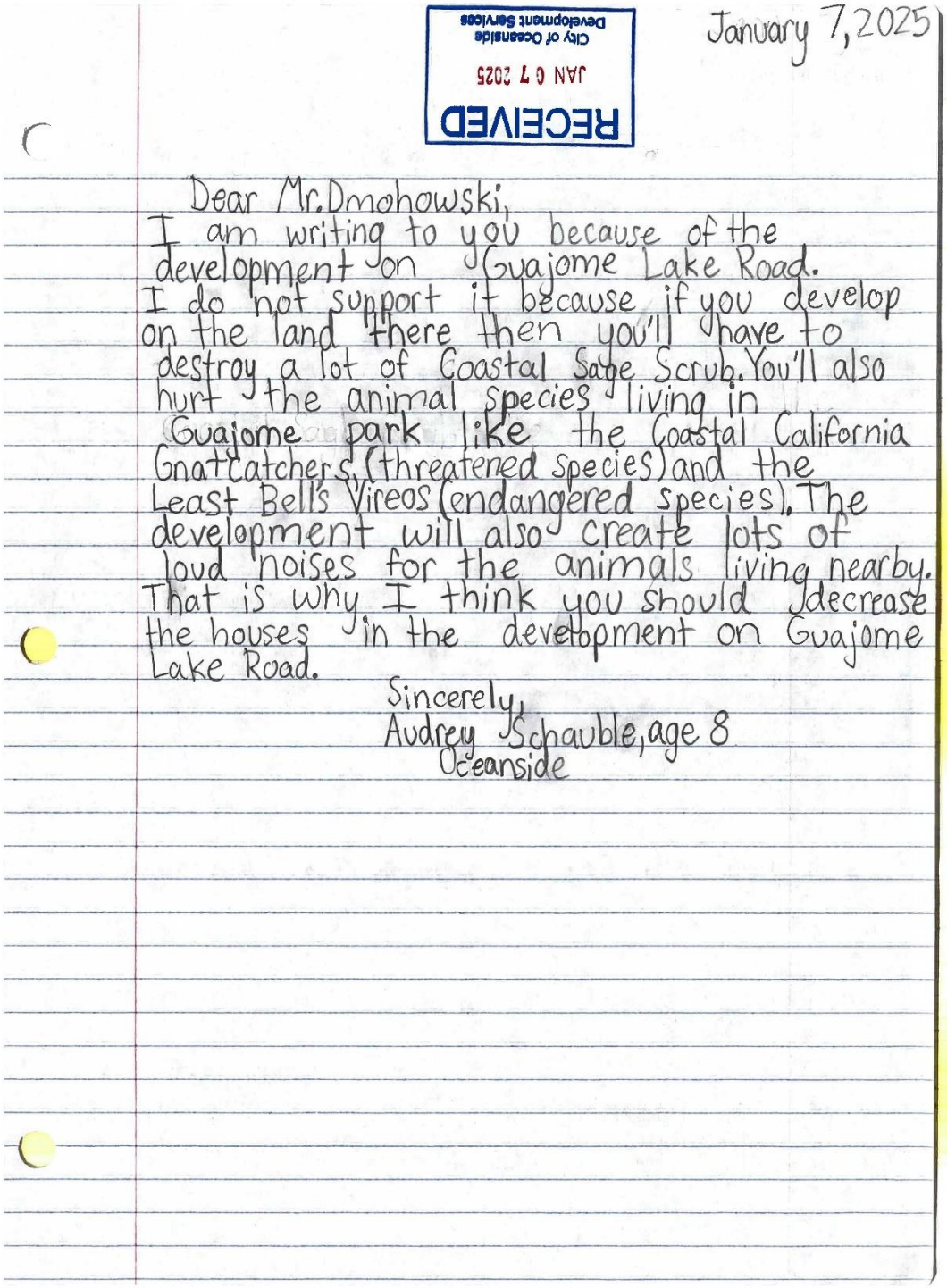
Lot 35/Lot 36 from the proposed internal road system. Also refer to Responses to Comments I7-4 and I8-3 above.

I8-9 The commenter expresses concern over adequate guest parking. In response, the project would provide two-car garages for each single-family home, which would include a full driveway for guest parking. Additionally, 32-foot-wide street sections are proposed, allowing for approximately 10 additional on-street guest parking spots in these sections. As outlined in Table 3.3-1 of the Draft EIR and updated in Chapter 3, Errata, of this Final EIR, the project is consistent with the City's parking standards. Further, parking is generally considered a social impact, not an environmental impact subject to CEQA (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 697). This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

I8-10 This commenter provides their contact information. This comment is noted; no response is required.

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Comment Letter I9



RECEIVED
City of Oceanside
Development Services
JAN 07 2025

January 7, 2025

Dear Mr. Dmohowski,
I am writing to you because of the development on Guajome Lake Road. I do not support it because if you develop on the land there then you'll have to destroy a lot of Coastal Sage Scrub. You'll also hurt the animal species living in Guajome park like the Coastal California Gnatcatchers (threatened species) and the Least Bell's Vireos (endangered species). The development will also create lots of loud noises for the animals living nearby. That is why I think you should decrease the houses in the development on Guajome Lake Road.

Sincerely,
Audrey Schauble, age 8
Oceanside

I9-1

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Response to Comment Letter I9

Individual
Audrey Schauble
January 7, 2025

I9-1 The commenter expresses opposition to the project and concerns about the impact that removal of habitat and open space will have on wildlife. In regard to project impacts to biological resources, please refer to Response to Comment I5-1 above. The analysis of impacts to biological resources in Section 4.3 of the Draft EIR included an analysis of direct impacts, impacts related to habitat, and indirect impact from project noise and increased human presence. The general opposition to the project is noted. The comment does not raise any issue concerning the adequacy of the Draft EIR and no further response is required. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

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Comment Letter I10

Robert Dmohowski

From: riellyirishclan@gmail.com
Sent: Wednesday, January 8, 2025 4:18 PM
To: Robert Dmohowski
Cc: 'Jennifer Schauble'; Anncam4@yahoo.com
Subject: Guajome Lake Roads Project

Warning: External Source

Hi Rob,

I would like to address a few more areas of concerns regarding the proposed development. I did send you a letter during the holidays, hopefully you have received. I10-1

I am 66 years old; I have personally lived on Albright Street since I was 9 years old. My parents purchasing the property across from 5430 Albright Street, splitting the property (the Laddon property was featured in Sunset Magazine)and building their dream home, in which my husband and myself currently reside. My daughter and her son live at 5430 Albright Street. I have history here. I grew up here, I got married here, I raised a family here, now hoping to retire here to watch my grandkids grow up. I have seen so many changes in the area – at one time I could ride my horse from my house to Fallbrook. Now that would be a death sentence but still this area remains beautiful and peaceful. I am engaged and passionately committed to keeping the area as intended. I10-2

I do want to state, I would like to see more meetings with the surrounding residents to talk about specifics with this project that will greatly impact our way of life, living, safety and concerns. Over the last 50 years my parents were involved in the project that is right off the park. During that time, the city of Oceanside stated the equestrian trails, and equestrian overlay would always take top consideration. I see that many of the items within the EIR state they have been waived, without any notice or input from residents. The two blind curves on Guajome Lake Road were always set to be widened and straightened in the event future homes went in. You don't live here, but in the morning Guajome Lake Road is a freeway for traffic and short cut between the major high schools and people going to and from work. They take no consideration of horses that are butted against Guajome Lake Road and their safety. I know for a fact the residents Ann Laddon and Adrian Jaffer have spent a fortune upgrading their home and made beautiful stalls for the horses. To state there will not be an environmental impact from this project could not be further from the truth. I10-3

This project will deeply impact daily lives for myself, my family who lives across the street, and my neighbors. Our privacy will be gone, the horse equestrian trails are said to disappear, the equestrian overlay has already been removed. I have said it before, the timing of this was very detailed choregraphed by the city during the busiest time of the year – most likely in hopes no one would take any action. I think if it was your neighborhood, you would be as passionate as we are. This is a beautiful area that will be forever damaged all due to greed. If there was a strong feeling for the environment and the proposed development – it would be greatly different. The density is disgusting at best. Along my border property (setbacks have been removed) will be approximately 14 homes looking directly into my house. 83 homes with most likely 2 cars per household, 166 more cars on the road – the dust, the impact on wildlife, we just saw an eagle over the holidays!, we have bobcats, cayotes, birds in abundance, federally endangered species have been identified, The Native American Heritage Commission, and San Luis Rey Band of Indians have all been actively aware of the cultural resources on the proposed site. Once your project begins, the area will never be the same. Destroyed forever. The city is not concerned about the housing crisis, it is looking for more money into the system – please do not let greed take away from this beautiful area and destroy it permanently. I10-4

I, like all the surrounding neighbors, wish the project was more thoughtful and will take in consideration the environmental impact, less dense larger size homes with equestrian theme and access to compliment this wonderful I10-5

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area. Shoving 83 homes into less than 12 acres is a crime and will take away from the beauty and bountiful established nature that exists. Do I think this area will never be developed – no. My intention is to fight for a purposeful, non-impact, conducive to existing area, horse oriented. I also want to mention my property has a running creek; it is adjacent to another neighbor who has the creek running through their property as well. I know the bottom section was to remain open no homes to keep a barrier, but no matter how you look at this project, the impact will destroy what is left of a nice piece of country in the middle of the city. Guajome Park is enjoyed by campers, joggers, walkers, bird seekers, bikers, equestrians – let's work together to maintain the integrity of the area and take consideration of the residents and not disrupt our way of living and life.

I10-5 Cont.

More than just moving forward with the project, do take in consideration: environmental impact, resident impact, safety impact. A project like this should add to the beauty of the area and help preserve our resources. Not destroy and damage leaving the impact that will disrupt my personal lifestyle and that of surrounding neighbors. The Equestrian Overlay has not been addressed, this is huge, considering this is what Guajome Lake Park was intended for in the beginning. I personally feel before any project can begin, all questions and concerns need to be thoroughly addressed.

I look forward to more meetings to discuss these concerns – my intention of this letter is to formally state, I do not agree with the proposed development, density, and the environmental impact it will have. My family has paid into the tax system for many years to support Oceanside – please stop and listen to the concerns of the citizens and work together for a reasonable solution.

I10-6

Tim and Diane Rielly
5497 Albright Street, 5430 Albright Street

Response to Comment Letter I10

Individual
Tim and Diane Rielly
January 8, 2025

I10-1 The commenter begins their letter expressing a general concern for the project and references a letter sent to the City during the holidays. The City received a letter from Diane Rielly on December 27, 2024, which is addressed above in Comment Letter I2.

I10-2 The commenter describes living in the project area and changes to the beauty and peace in the area. This comment does not raise any issues related to the adequacy of the Draft EIR and no further response is required.

I10-3 The commenter requests more meetings with surrounding residents to discuss project specifics and suggests that no notice or input from residents in regard to the proposed waivers described in the Draft EIR have been provided. The commenter also expresses traffic and safety concerns over existing alignment of Guajome Lake Road and the project's potential impact on horses.

Consistent with CEQA guidelines, the public is provided with opportunities during the 45-day Draft EIR public comment and review period—this period was extended to 51 days for the project. The project will also be heard at a public hearing before the Planning Commission. The Draft EIR was published and distributed in accordance with California State Clearinghouse requirements and City requirements. The Planning Commission hearing will be held after the release of the Final EIR, which includes this formal Responses to Comments document.

Additionally, while public input is considered during the review process, the final decision on granting waivers is made by the relevant planning and regulatory authorities. The community can voice their opinions and concerns during public hearings or through written comments, but the authority ultimately decides based on various factors, including compliance with laws and regulations (including the state Density Bonus Law and the Housing Accountability Act), project feasibility, and overall public benefit.

As stated in Section 4.14.4 of the Draft EIR: "The project requests waivers from the Equestrian Overlay District development standards. The project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses in the surrounding area." Please refer to Response to Comment I2-8 above for discussion as to why a waiver is being requested for the equestrian overlay development regulations. In regard to traffic concerns and the alignment of Guajome Lake Road, please refer to the Draft EIR Section 4.15, Traffic and Circulation, which includes discussion of proposed paving and realignment of Guajome Lake Road for the length of the property frontage and west of the site where it connects to Albright Street, approximately 1,200 linear feet. For additional discussion related to proposed road improvements and traffic safety concerns, please refer to Responses to Comments I1-2 and I1-3 above. The proposed road improvements to Guajome Lake Road would meet the City's standards for public roads and would not be expected to result in a safety hazard for horses in the area.

I10-4 The commenter expresses concern that the project will impact privacy of nearby homes, result in removal of existing equestrian trails, and removal of equestrian overlay standards. The commenter also

expresses concern that the area will be permanently damaged, expresses opposition to the proposed density, and expresses concern related to dust, wildlife, and Native American resource impacts.

The comment addresses a number of general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. Although home privacy is not considered an environmental concern, please refer to I2-2 above for a discussion of visual impacts analyzed in the Draft EIR. The project would not result in the removal of any existing equestrian trails. In regard to the requested waivers for Equestrian Overlay development standards, please refer to Responses to Comments I2-8 above and O5-4 and O5-5 below.

In regard to project density concerns, please refer to Responses to Comments A3-9 and I2-8 above. The Draft EIR analyzed all environmental impacts of the project, including permanent impacts. In regard to dust concerns, please refer to Response to Comment I2-5 above. In regard to wildlife concerns, refer to Response to Comment I5-1 above. Justification of proposed mitigation for the project is outlined in the BTR, included as Appendix C to the Draft EIR and as revised in Chapter 3, Errata, of the Final EIR. In regard to impacts to Tribal Cultural Resources (TCRs), please refer to the analysis in Draft EIR Section 4.16, Tribal Cultural Resources. Although considered unlikely based on the South Coastal Information Center records search, the current disturbed state of the project site, and other information received by the City to date, there remains the potential for the project to encounter previously unknown and unanticipated TCRs during construction of the proposed project. Although impacts to TCRs are not anticipated, to ensure project development would not result in potential impacts to cultural resources or TCRs, the project would implement the City's Mitigation Measure (MM)-CUL-1 through MM-CUL-9, outlined in Section 4.4, Cultural Resources, of the Draft EIR.

I10-5 The commenter requests a more thoughtful project that takes environmental impacts into consideration and proposes a small number of larger homes that allows for equestrian access to compliment the area. The commenter also makes reference to a creek in the area and Guajome Regional Park and requests that the City and neighbors work together to maintain the integrity of the area and with consideration of residents and their way of life. The comment addresses a number of general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The Draft EIR Chapter 8, Alternatives, looked at alternatives to the project, including alternatives with reduced impacts to biological resources. For more discussion related to such project alternatives, please refer to Section 8.3.2 of the Draft EIR and Responses to Comments A3-9 and A3-10 above.

Draft EIR Section 4.9, Water Quality and Hydrology, analyzed potential impacts to waterbodies, including creeks. As indicated in Draft EIR Section 4.9, no significant impacts to hydrology or water quality would occur with implementation of the project. Potential impacts to recreational facilities, including Guajome Regional Park, were analyzed in Draft EIR Section 4.14, Recreation. Impacts to recreational facilities, including the park, would be less than significant.

I10-6 The commenter summarizes the themes of the comment letter, states their opposition to the project, and states they look forward to discussing these concerns in upcoming meetings. Please refer to Response to Comment I10-1 in regard to future project meeting opportunities. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

Comment Letter I11

Robert Dmohowski

From: Ann Palmisano <anncam4@yahoo.com>
Sent: Wednesday, January 8, 2025 5:42 PM
To: Robert Dmohowski
Subject: Guajome Lake road development opposition

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Ann Palmisano

Robert Dmohowski

Dear Mr. Dmohowski,

I am writing to express my strong opposition to the proposed Guajome Lake Road development. My family and I have been residents of Albright Street for twelve years, and we deeply value the peaceful, natural character of our neighborhood. Our home provides a sanctuary where we can enjoy the local wildlife – squirrels, rabbits, hawks, and even occasional roadrunners and owls. This tranquil environment was a primary reason we chose this location and subsequently purchased the adjacent property at 5464 Albright Street to help preserve it. Many of our neighbors share this sentiment, and they welcomed our acquisition of the neighboring lot. I11-1

However, the proposed development presents significant concerns. The substantial increase in housing density poses a serious threat to our local ecosystem and the safety of our community. Increased traffic volume will severely impact emergency response times, particularly concerning given the presence of elderly residents in our neighborhood. Furthermore, the already excessive speed of vehicles on Guajome Lake Road presents a considerable danger, exacerbated by dust created by speeding cars which negatively impacts our equine neighbors at the bottom of the hill. The proposed development would undoubtedly worsen this situation, creating an unacceptable risk to both human and animal residents. I11-2

We believe this development would have catastrophic consequences for the natural environment, resident safety, and the overall quality of life in our neighborhood. For these reasons, my family and I firmly oppose the Guajome Lake Road development proposal.

Sincerely, I11-3

Ann Palmisano

5452 Albright St. and 5464 Albright St.
Sent from Yahoo Mail for iPhone

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Response to Comment Letter I11

Individual
Ann Palmisano
January 8, 2025

I11-1 The commenter expresses opposition to the proposed project and explains that they are a resident on Albright Street that deeply values the local wildlife and natural character of the neighborhood. The commenter also states that their neighbors share this sentiment. This comment does not raise any issues related to the adequacy of the Draft EIR, and no response is required. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

I11-2 The commenter expresses concern that the project density poses a threat to the ecosystem and community safety, and that project traffic will severely impact emergency response times. The commenter also expresses concern that the project will add to existing traffic speed and dust issues on Guajome Lake Road that negatively impact neighbors and animals in the area.

Regarding ecosystem concerns, please refer to Section 4.3 of the Draft EIR and Response to Comment I5-1 above for a summary of biological resources analyzed in the Draft EIR and proposed mitigation measures. Please refer to Response to Comment I4-4 for a detailed response on evacuation routes and traffic. The project is not anticipated to significantly impact evacuation routes or impact emergency response times to the existing community. Further, as discussed in Draft EIR Section 4.13, Public Services, Section 4.18, Wildfire, and Appendix O, Fire Protection Plan Letter Report, the project would have a less than significant impact on fire protection and emergency evacuation. As discussed in Appendix O, the proposed development would be substantially consistent with the Oceanside Fire Department's 5-minute response time goal and fully compliant with the National Fire Protection Association's national guideline of having a fire response time of 6 minutes and 30 seconds, 90% of the time. The anticipated response time is adequate to avoid a significant environmental impact and mitigation is not required. To provide additional clarification on emergency response times for the proposed project, text revisions to Section 4.13, Public Services, Section 4.18, Wildfire, and Appendix O are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. Further, the Oceanside Fire Department would be required to review and approve all final site plans for the project to ensure adequate site accessibility and response times and the project would be required to provide adequate site access and emergency access to maintain fire department response times. Additionally, the City has an established public facility development impact fee program (Municipal Code Chapter 32B and 32C) that requires new development to provide funds toward capital improvements for public services, including fire and emergency services. The project would be required to pay applicable developer impact fees in accordance with the City's requirements as well as the City of Oceanside Community Facilities District No. 2022-1 (Public Safety Services). Thus, should improvements be needed to address City response gaps, these fire mitigation fees would help fund such improvements when and where Oceanside Fire Department determines they are needed. In regard to traffic safety, please refer to Response to Comment I1-2 above. The speed limit on Guajome Lake Road would remain 25 miles per hour. With project implementation, speed limits within the project site would be regulated for the safety of both vehicular and pedestrian traffic. Speculation about future users that might exceed the speed limit is not a proper basis for CEQA analysis as it is not considered a reasonably foreseeable

impact to the physical environment. In regard to dust concerns, specifically dust issues on Guajome Lake Road that may negatively impact equine neighbors at the bottom of the hill, please refer to Response to Comment I2-5 above, which states that the project would pave the segment of Guajome Lake Road along the project site frontage and extending west to Albright Street, approximately 1,200 linear feet, which would help address dust impacts from the existing dirt road. The project does not propose improvements to an unpaved segment of Guajome Lake Road located southeast of the project site. The speed limit for the entire road would remain at 25 miles per hour. Specifically, project-generated operational dust impacts were analyzed in Draft EIR Section 4.2, Air Quality, and Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report. CalEEMod modeling for the project has been updated to include emissions calculations for project-generated vehicle travel along the 800-foot segment of unpaved Guajome Lake Road southeast of the project site. The revisions apply to Draft EIR Section 3.2.5, Project Design Features, and Draft EIR Section 4.2, Air Quality, with text additions and revisions shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. As indicated in the Errata, the revised modeling assumptions associated with fugitive dust related to project-related travel on this unpaved segment of Guajome Lake Road would result in an increase in PM_{10} and $PM_{2.5}$ emissions during operation of the project. However, PM_{10} and $PM_{2.5}$ emissions during operation of the project would remain below the SDACPD emission-based threshold. Therefore, consistent with the analysis in the Draft EIR, impacts associated with project-generated operational criteria air pollutant emissions would remain less than significant with mitigation incorporated (Mitigation Measure [MM]-AQ-2). The additional analysis further supports the original impact conclusion in the Draft EIR associated with operational criteria air pollutant emissions. Which is to say, the project would not result in significant impacts related to dust along this roadway. This comment does not raise any issues related to the adequacy of the Draft EIR. Therefore, no further response is required.

I11-3 The commenter expresses opposition to the project and cites concern that the development would have catastrophic consequences to the natural environment, resident safety, and quality of life. Please refer to Response to Comment II11-2 above. In regard to quality-of-life concerns related to the project, the commenter does not state any specifics. Please refer to Response to Comment I2-7 above for a general summary of the analysis provided in the Draft EIR. The comment is noted as providing a concluding remark that does not raise any specific environmental issues related to the adequacy of the Draft EIR, such that no further response is required.

Comment Letter I12

Robert Dmohowski

From: Macie Mathewson <mathewsonma@yahoo.com>
Sent: Wednesday, January 8, 2025 9:26 PM
To: Robert Dmohowski
Subject: Guajome Park Development

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Dear Mr. Dmohowski,

As a frequent visitor of Guajome Park, nature lover, and resident of Oceanside, I am appalled by the proposed high density development next to Guajome Park. The impact that this proposed development would have on native wildlife would be detrimental. Per the dEIR, confirmed nests have been found on site for an endangered species (Costal California Gnatcatcher) with the high possibility of more endangered species to make this habitat their home. Seeing as though Guajome is part of the largest wildlife corridor in the area, it is our duty as proud Oceanside residents to protect it. Beyond the environmental impact, this proposed project raises many concerns of traffic, safety, and air quality in the area. We are a growing family living directly across from Guajome, hoping to give our children a great life in Oceanside. We chose our home because of its proximity to nature, losing that would be devastating. Not to mention, per the dEIR, the project would generate 830 average daily vehicle trips raising concerns of air quality, impact on fire routes, and pedestrians safety. The list goes on with the potential negative impacts this project would have on our community. We implore you to take this all into consideration and stop this project from going through.
Thank you for your consideration.

Macie Mathewson-Smelser

I12-1

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Response to Comment Letter I12

Individual
Macie Matthewson
January 8, 2025

I12-1 The commenter expresses opposition to the proposed "high density" development next to Guajome Regional Park and the impact the project would have on native wildlife, including endangered species and their habitat. The commenter also makes reference to Guajome as the largest wildlife corridor in the area and expresses concern for project-related traffic generation, pedestrian safety, fire route, and air quality impacts. The comment is noted as expressing general opposition to the project. Regarding concerns about project density, the project would not introduce high-density housing but rather single-family homes that complement the existing residential developments in the area and would be consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and the City's zoning designation for the site in combination with the increased density allowed under the state Density Bonus Law. Further the proposed single-family development would be compatible with existing residential developments in the area. The City of Oceanside General Plan defines the high-density housing residential land use category as developments with 21 to 43 units per acre which is significantly higher than the project's proposed density of 4.9 dwelling units per acre. Regarding environmental issue areas, the comment addresses general subject areas, which received extensive analysis in the Draft EIR. Because the comment does not raise any specific issue regarding that analysis, no more specific response is required. Nonetheless, in response to concerns about potential impacts to endangered species and sensitive habitats, please refer to Response to Comment I5-1 above. In regard to concerns about project-related impacts to a wildlife corridor, please refer to Response to Comment A3-15 above. In regard to project-related traffic generation and associated safety concerns, please refer to Responses to Comments A2-13, I1-2, and I1-3 above. Consistent with the City's General Plan, the project is projected to generate 830 average daily trips (ADT), less than the 1,000 ADT threshold for further vehicle miles traveled (VMT) analysis, thus further VMT analysis is not required, and impacts are determined to be less than significant (see Draft EIR Section 4.15, Traffic and Transportation). In regard to project-related fire route concerns, please refer to Response to Comment I4-4 above, In regard to project air quality impacts, please refer to the detailed analysis in Section 4.2, Air Quality, of the Draft EIR and refer to Response to Comment I2-5 above for a detailed discussion of potential dust-related impacts.

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Comment Letter I13

Robert Dmohowski

From: Kenneth Weaver <gnatcatcher@sbcglobal.net>
Sent: Thursday, January 9, 2025 3:34 PM
To: Robert Dmohowski
Subject: Guajome Home Project

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Rob Dmohowski, AICP, Principal Planner
City of Oceanside
Planning Division
300 North Coast Highway
Oceanside, CA 92054

Dear Mr. Dmohowski,

Please note my opposition to the Guajome home project as it currently stands. I13-1

The project at its current density is out of character with the rural nature of the area. Guajome Lake Road will not be sufficient to handle the increase in traffic. I13-1

A fire evacuation route is already seriously compromised by previous developments. This project will only add to the safety issues. We only need to look at recent fires in Los Angeles to know that this is a major problem with this project. I13-2

Guajome Lake Road borders a regional park which is heavily used by the local population, including my family. Pedestrians already face safety issues accessing the park, but this is insufficiently addressed in the dEIR. I13-3

Finally, insufficient detail on protecting natural resources is included in the report even though this project will likely pollute nearby creeks, impact air quality, and destroy wildlife habitat on site, as well as impacting Guajome Regional Park, an important natural corridor for wildlife. I13-4

I urge you address these concerns,

Kenneth Weaver

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Response to Comment Letter I13

Individual
Kenneth Weaver
January 9, 2025

I13-1 The commenter states opposition to the proposed project and expresses concern that the proposed density will conflict with rural character of the area and that Guajome Lake Road would not be able to sufficiently handle the addition of project-generated traffic. Regarding concerns with the project on the rural character of the area, refer to Response to Comment I2-8 above. In regard to the addition of project-generated traffic on existing roads, please refer to the detailed analysis in Draft EIR Section 4.15, Traffic and Transportation, and Response to Comment I1-2 above.

I13-2 The commenter expresses concern that existing fire evacuation routes will be further compromised with the addition of the project, adding to existing safety concerns. The commenter also makes a correlation between recent wildfires in Los Angeles and fire impacts of the proposed project. Please refer to Response to Comment I4-4 for a detailed response on evacuation routes and traffic. As detailed in Draft EIR Sections 4.13, Public Services, and 4.15, Traffic and Circulation, the project would provide all required emergency access in accordance with the requirements of the Oceanside Fire Department.

I13-3 The commenter expresses concern regarding safety of pedestrians accessing Guajome Regional Park from Guajome Lake Road and that it is not sufficiently addressed in the Draft EIR. Please refer to Response to Comment A2-13 above.

I13-4 The commenter expresses concern that the Draft EIR lacks detail on the protection of natural resources and that the project could result in impacts to creeks, air quality, onsite wildlife habitat, and Guajome Regional Park as a wildlife corridor. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. Because the comment does not raise any specific issue regarding that analysis or where detail is allegedly lacking, no more specific response can be provided. Please refer to Section 4.9, Hydrology and Water Quality, and Response to Comment I6-4 for a detailed response on potential for project runoff to impact nearby waterways. Please refer to the analysis in Section 4.2 of the Draft EIR, Air Quality, for a detailed environmental analysis related to air quality, and Response to Comment I2-5. In regard to project impacts on biological resources and wildlife corridors, please refer to Response to Comment I5-1 above, and Section 4.3, Biological Resources, of the Draft EIR.

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Comment Letter I14

January 9, 2024

To: Mr. Dmohowski, Principal Planner City of Oceanside

From: Doreen Stadtlander, Oceanside Resident

Subject: Guajome Lake Homes Project

I am a resident of the City of Oceanside and have looked at the draft environment impact report for the subject project. My concerns with the proposed project is the failure of the developer to provide a reasonable development scenario that is compatible with the neighborhood character particularly in light of its close proximity to Guajome Regional Park, and impacts to biological resources/connectivity. I am concerned that approving all the requested waivers and allowing such high density will set precedent for future developments. I14-1

The City's General Plan Land Use Element includes policies related to land use compatibility, neighborhood character, site design, and natural resource management. Guajome Regional Park Sphere of Influence area has the objective to protect the valuable natural and cultural resources of Guajome Regional Park by ensuring future development in areas adjacent to or visible from Guajome Regional Park would be compatible with its recreation and scenic areas. The underlying premise of these objectives and associated policies was that any future development would adhere to the existing underlying zonings which in the case of the proposed project is SFD-R. The proposed project would grossly exceed the existing zoning resulting in the construction of 83 single family homes which is incompatible with the open natural landscapes provided by the regional park and surrounding low density horse lots and ranchettes. The project would significantly diminish the neighborhood character and visual/aesthetics of the area. I14-2 I14-3

The proposed project requests waiver of the requirements of the Equestrian Overlay. The project makes no genuine attempt to address the overlay requirements and it is unclear what gives the rights to the developer to totally disregard the overlay requirements. Establishment of the overlay was to ensure development would provide for recreational opportunities (ie trails); ensure appropriate design standards/criteria for keeping and protecting horses on private property; and create/ enhance/ and protect the equestrian and rural atmosphere within the overlay area by integrating open space areas and urban areas with horse trails. The overlay goes on to identify specific requirements to meet the purposes. Instead of just totally dismissing the overlay, the DEIR should identify an alternative that addresses the requirements of the overlay. I14-4

The DEIR does not adequately assess impacts to wildlife connectivity. The proposed project represents an overland connection between the Caltrans owned Jeffries Ranch preserve and Guajome Regional Park. The Jeffries Ranch preserve was established subsequent to the City's draft Subarea Plan (SAP) and supports breeding coastal California gnatcatchers (CAGN) and other native wildlife species such as bobcats and coyotes. To reach Guajome Park, species can traverse via the creek to the onsite coastal sage scrub (CSS) and over to Guajome Park. Although the project site has limited vegetation, it's juxtaposition to the park and overall limited aerial extent allows for movement to Guajome Park. This issue needs to be assessed. I14-5

Development of proposed project site would result in the loss of CSS occupied by breeding CAGNs. The occupied habitat on the project site is connected to the breeding population of CAGN on the Jeffries Ranch preserve. Conserving CAGN breeding locations contributes to demographic recovery capabilities of breeding areas. For example, should fire impact the Jeffries Ranch preserve, CAGN occupied areas such as the project site could provide a source of recolonization. Because the project site supports breeding CAGN and is connected to the Jeffries Ranch preserve, direct and indirect impacts to the onsite CSS habitat need to be avoided. I14-6

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Response to Comment Letter I14

Individual
Doreen Stadtlander
January 9, 2025

I14-1 The commenter expresses concern that the project will not be compatible with the surrounding neighborhood character, in light of the project's close proximity to Guajome Regional Park and impacts to biological resources and connectivity. The commenter also asserts that the approval of project's requested waivers and high density will set a precedent for future development. Please refer to Response to Comment A3-15 for discussion related to wildlife corridor and movement and refer to Section 4.3, Biological Resources, of the Draft EIR for a detailed analysis of impacts on biological resources. In regard to project consistency with visual character of the surrounding area, please refer to Response to Comment I2-8 above for a summary of visual impacts analyzed in the Draft EIR. Additionally, The technical sections included in Chapter 4 of the Draft EIR evaluate the project's compatibility with adjacent land uses, including changes in aesthetics and visual character (Section 4.1, Aesthetics) and consistency with applicable plans (Section 4.10, Land Use and Planning). The Draft EIR evaluates the whole of the project, including the requested waivers, and finds that the waivers would not result in any significant impacts. Also refer to Responses to Comments I2-8 and O5-3 for further discussion on requested waivers, proposed density of the project, and requirements of the state Density Bonus Law. Contrary to the comment's assertion that the approval of the project's waivers and high density will set a precedent for future development, a project that meets state Density Bonus Law eligibility criteria is entitled to a density bonus, concessions/incentives, development standard waivers, and reduced parking ratios (Gov. Code, § 65915(b), (d), (f), (p)). The law explicitly states that the City must grant these benefits unless limited exceptions apply (Gov. Code, § 65915(d)(1)(A)-(C)). The purpose of these provisions is to help close the financing gap for affordable housing and promote residential development statewide (Gov. Code, § 65915(u)(1), (2)). It would be speculative to assume that the proposed project density and waiver requests would influence future development in the area, especially where such requests are permitted under the state Density Bonus Law for qualifying projects. Further, as discussed in Response to Comment I2-8, the project would not introduce high-density housing but rather single-family homes that are consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with existing residential developments in the area The City of Oceanside General Plan defines the high-density housing residential land use category as developments with 21 to 43 units per acre which is a significantly higher number of dwelling units per acre compared to the project's proposed 83 single-family homes on a gross acreage of 16.78 acres, which is 4.9 dwelling units per acre. As detailed in the EIR, a property owner may increase density (the total number of dwelling units) on their property above the maximum set under the City's General Plan in exchange for providing affordable housing in accordance with the state Density Bonus Law. The project is consistent with Density Bonus regulations pursuant to state and local laws. As outlined in Table 4.10-1 of the Draft EIR and as analyzed throughout the EIR, with approval of the requested density bonus, the project would not conflict with the goals, policies, and objectives of the City's General Plan, including the land use and zoning designations for the site in combination with the increased density allowed under the state Density Bonus Law.

I14-2 The commenter references the objective of the Guajome Regional Park Sphere of Influence (SOI) to protect Guajome Regional Park and the City's General Plan Land Use Element, including policies related

to land use compatibility, neighborhood character, site design, and natural resources management. The commenter also expresses concern about the project's density exceeding the existing zoning for SFD-R resulting in 83 single-family homes which is incompatible with the regional park and surrounding low density horse lots and ranchettes. Please refer to Responses to Comments I2-8 and I14-1 above for responses related to the commenter's concerns about the project's compatibility with the surrounding neighborhood character. Refer to Response to Comment O2-33 below, addressing the Guajome Regional Park SOI discussion within the aesthetics analysis demonstrating the project's consistency with specific Guajome Regional Park SOI policies.

Please refer also to Response to Comment O5-2, addressing that granting a density bonus, incentive, concession, or waiver, shall not constitute a valid basis on which to find a proposed housing development project is inconsistent, not in compliance, or not in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision, according to the Housing Accountability Act (Gov. Code, §65589.5), and Section 65905.5 of the Government Code (adopted as part of the Housing Crisis Act of 2019, also known as Senate Bill [SB] 330). In other words, the increased density allowed under the state Density Bonus Law for the proposed project is not inconsistent with the General Plan's land use designation for the project site. The project's consistency with the City's General Plan elements goals, policies, and objectives is provided in Table 4.10-1, City of Oceanside General Plan Consistency Evaluation (refer to Draft EIR Section 4.10, Land Use and Planning, and update to Table 4.10-1 as shown in Chapter 3, Errata, of this Final EIR). As outlined in Table 4.10-1 of and analyzed throughout the EIR, with approval of the requested density bonus, the project would not conflict with the goals, policies, and objectives of the City's General Plan, including the City's General Plan's land use designation of Single Family Detached Residential (SFD-R) for the project site. The project is shown to be consistent and compliant with applicable standards of the City's General Plan and zoning in combination with the increased density allowed under the state Density Bonus Law.

I14-3 The commenter states that the project would diminish neighborhood character and visual/aesthetics of the area. Please refer to Responses to Comments I2-2 and I2-8 above for a discussion of project consistency with area character and visual impacts analyzed in the Draft EIR.

I14-4 The commenter expresses concern over the proposed project's request of waiving the requirements of the Equestrian Overlay and recommends that the Draft EIR should identify an alternative that addresses the requirements of the overlay instead. In response, refer to Response to Comment I2-8 for discussion of waivers proposed and Response to Comment I2-3 discussing that the project would not impact trails. As detailed in Draft EIR Chapter 8, Alternatives, an alternative that would retain both the Scenic Park Overlay zone and Equestrian Overlay zone was considered (see Draft EIR Section 8.3.3, Existing Land Use Designation Alternative). This alternative was considered but rejected because it would result in the same or similar impacts to that of the proposed project. As further discussed in Responses to Comments I23-3 and I23-14 below, a Reduced Density Alternative was also considered in Draft EIR Chapter 8, Alternatives.

I14-5 The commenter states that the Draft EIR does not properly assess the impacts to wildlife connectivity and specifically states that the project site, while containing limited vegetation, provides an overland connection to Guajome Regional Park. Section 4.3, Biological Resources, under Threshold (d) acknowledges that the Diegan coastal sage scrub onsite supports coastal California gnatcatcher and likely serves as a stepping-stone for dispersing individuals and habitat for the resident pairs.

However, as also stated in Section 4.3, the project site is located outside of the Wildlife Corridor Planning Zone designated by the Subarea Plan. The project conserves the riparian corridor, which is designated as hardline preserve in the Subarea Plan to provide a regional connection. Please also refer to Responses to Comments I6-1 and A3-14 through A3-17 above.

I14-6 The commenter states the project would result in a loss of coastal sage scrub occupied by coastal California gnatcatchers and expresses concern that, because the project site supports breeding coastal California gnatcatcher and is connected to the Jeffries Ranch preserve, direct and indirect impacts to the onsite coastal sage scrub habitat needs to be avoided. Refer to Response to Comment I14-5 above and Section 4.3, Biological Resources, of the Draft EIR. As described therein, the project would impact 1.25 acres of coastal sage scrub, while avoiding impacts to 0.95 acres. Impacts would be mitigated at a 2:1 ratio within an off-site mitigation site, Quarry Creek per Mitigation Measure (MM)-BIO-1. Further, take of habitat for coastal California gnatcatcher would need to be granted through the Section 10 consultation process with the U.S. Fish and Wildlife Service (MM-BIO-11).

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Comment Letter I15

Robert Dmohowski

From: Susan Liebes <sujackso@hotmail.com>
Sent: Friday, January 10, 2025 6:54 AM
To: Robert Dmohowski
Subject: Guajome Lake Road Subdivision

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Warning: External Source

Dear Mr. Dmohowski,
As a Wildlife Biologist and frequent visitor to Guajome Park, I am concerned about the proposed high density development next to Guajome Park.
As the EIR states, this project will impact several species of special concern, including the California gnatcatcher and Least Bell's Vireo: "While relatively isolated from large undeveloped areas and other preserves, the Diegan coastal sage scrub supports the coastal California gnatcatcher and likely serves as a stepping-stone for dispersing individuals as well as habitat for the resident pairs. The Diegan coastal sage scrub also supports a variety of birds, reptiles, invertebrates, and small mammals commonly found in upland scrub. In addition, the riparian habitat on site provides potential foraging and nesting opportunities for least Bell's vireo. This habitat may also serve as a stepping stone for this species."
Considering the importance of this habitat to these Threatened species, I encourage the adoption of ES.7.3 Townhome (Coastal Sage Scrub Impact Avoidance) Alternative.
Thank you for considering my concerns,
Susan Liebes

I15-1

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Response to Comment Letter I15

Individual
Susan Liebes
January 10, 2025

I15-1 The comment expresses concern in regard to the proposed project density given its proximity to Guajome Regional Park. The comment also summarizes Draft EIR text that describes Diegan coastal sage scrub and riparian habitat on-site and encourages the adoption of the Townhome Alternative given the importance of these habitats and the species they support.

The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. While the comment expresses concern about the project density and its proximity to the regional park, the comment does not specify exactly what their concern is, such that no meaningful response can be provided. If the concern is related to potential impacts to a wildlife corridor, please refer to Responses to Comments A3-15 through A3-17 above. For discussion of potential project impacts to Guajome Regional Park, please refer to Response to Comment A2-16 above. Regarding concerns about project being "high density," refer to Responses to Comments I2-8 and I14-1 which discuss that the project would not introduce high-density housing but rather single-family homes consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with existing residential developments in the area. The increased density allowed under the state Density Bonus Law for the proposed project is not inconsistent with the General Plan's land use designation for the project site.

The request for adoption of the Townhome Alternative is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation. Note that while the Townhome Alternative would be environmentally superior to the project because it would provide a reduced level of impact in some environmental analysis areas under this alternative, impacts to biological resources, cultural resources, and geology and soils would still require mitigation to reduce impacts below a level of significance, similar to the proposed project. As discussed in Draft EIR Chapter 8, Alternatives, the Townhome Alternative would also not meet Objectives 1 and 4 of the project because this alternative would not be consistent with the existing single-family land use and zoning designation of the site and surrounding land uses. The decision to approve the proposed project or one of the alternatives will be made by the City decision-makers after release of the Final EIR.

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Comment Letter I16

Robert Dmohowski

From: denise.carrillo <denise.carrillo@att.net>
Sent: Friday, January 10, 2025 7:25 AM
To: Robert Dmohowski
Subject: Protest to proposed housing project in Jeffries Ranch/Guajome

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Warning: External Source

Dear Decision Makers,

I am highly opposed to new houses being built in Oceanside. There are birds that are protected in this area and wildlife deserves to have their homes safe. The new housing project in Morro Hills and the other new apartments near the bike trail have caused coyotes to relocate. We currently have a pack living at the end of our street. We see them walk around in daylight and one picked up a dog and tried to take it. We got the dog back and he's now in quarantine. I16-1

Oceanside is growing, in my opinion too fast. Let the new houses currently being built be completed and sold. Give nature a chance to settle and allow our community to grow gracefully. Thank you for your time and consideration. I16-2

Sincerely,

Denise Carrillo
235 Ocotillo Place
Oceanside, CA 92057

Sent via the Samsung Galaxy S10e, an AT&T 5G Evolution capable smartphone

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Response to Comment Letter I16

Individual
Denise Carillo
January 10, 2025

I16-1 The commenter expresses opposition to new houses being built in Oceanside and expresses concern that wildlife are having to relocate as a result. Regarding project impacts to biological resources and protected birds, please refer to Response to Comment I5-1 above. Coyotes are not considered a protected species; however, note the project would permanently preserve 6.92 acres of the 16.78-acre site as open space, which could be used by this and other species. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I16-2 The commenter provides their opinion that Oceanside is growing too fast and requests that nature be given a chance to settle and the community to grow gracefully. As described in Draft EIR Section 4.12, Population and Housing, the increase in population growth at the project site is anticipated by and accounted for in the City's General Plan Land Use Element and Housing Element based on the site's existing land use designation of SFD-R (Single-Family Detached Residential) and zoning designation of RS-SP-EQ (Single Family Residential – Scenic Park Overlay – Equestrian Overlay). This growth meets the applicable General Plan goals and policies, specifically Policy 3.5, which encourages development of low and moderate housing opportunities, and Policy 3.7, which encourages disbursement of low- and moderate-income housing throughout the City (Draft EIR, p. 4.12-9). This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

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Comment Letter I17

Robert Dmohowski

From: Janis <janisjones@me.com>
Sent: Friday, January 10, 2025 10:09 AM
To: Robert Dmohowski
Subject: Guajome Lake Homes

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Warning: External Source

Dear Mr. Dmohowski,

As someone who enjoys spending time in nature and as a frequent visitor to Guajome Regional Park, I am concerned about the Guajome Lake Homes development and how it will affect the surrounding natural environment. I17-1

I recognize that more housing, especially affordable housing, is needed in North County. However, the proposed density of the project is incompatible with the rural character of the area. I17-2

I urge you to consider the environmental, community, and cultural implications of this high density development. It is essential that all necessary mitigation measures are implemented to minimize potential impacts.

Thank you for your time and attention to this matter. I17-3

Sincerely,
Janis Jones

Sent from my iPhone

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Response to Comment Letter I17

Individual
Janice Jones
January 10, 2025

I17-1 The commenter states they are a frequent visitor to Guajome Regional Park and expresses concern regarding impacts on the surrounding natural environment from project implementation. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. A detailed analysis is provided in Draft EIR Section 4.3, Biological Resources, and Appendix C, Biological Technical Report, where potential direct and/or indirect significant impacts of the project to vegetation communities, special status wildlife species, potential jurisdictional resources, and wildlife corridors/habitat linkages were assessed and minimization and mitigation measures (MM-BIO-1 through MM-BIO-11) identified for implementation to reduce potential direct and indirect impacts to less than significant. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I17-2 The commenter acknowledges the need for more housing, specifically affordable housing, and expresses concern that the density of the proposed project is incompatible with the rural character of the area. Please refer to Responses to Comments I2-8, I14-1, and O5-5, addressing the project's compatibility with the surrounding area.

I17-3 The commenter ends their letter by urging the project team to consider all environmental, community, and cultural implications that could result from this "high density" development and requests the project team implement all necessary mitigation measures. Refer to Responses to Comments I2-8 and I14-1 which discuss that the project would not introduce high-density housing but rather single-family homes consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with existing residential developments in the area. Consistent with CEQA Guidelines, the EIR analyses the potential environmental impacts of the project – including impacts to cultural resources, tribal cultural resources, and land use/planning – and recommends mitigation measures to reduce identified potentially significant impacts. While CEQA requires an analysis of physical impacts to the environment arising out of a project's physical changes to the environment, "an economic or social change by itself shall not be considered a significant effect on the environment" (14 CCR 15131 and 15382). Thus, other community or cultural implications exceed CEQA's purview. Therefore, no further response is required.

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Comment Letter I18

Robert Dmohowski

From: Patte Hughes <pattehughes@gmail.com>
Sent: Friday, January 10, 2025 10:45 AM
To: Robert Dmohowski
Subject: Guajome Lake Road Development - OPPOSE

Warning: External Source

To whom it may concern

I am an Oceanside resident. The purpose of my letter is to **OPPOSE** the Guajome Lake Road development. Here are a few critical reasons why this project should be denied. I18-1

Birds!
Coastal California Gnatcatcher
The northern portion of the site contains important habitat for the Coastal California Gnatcatcher, a federally threatened species that is protected by the Endangered Species Act. The project would involve the destruction of 1.25 acres of this sensitive species' habitat (despite its designation as hardline preserve land in the regional conservation plan)

A California Gnatcatcher nest with three fledglings was confirmed during the surveys for the dEIR. In light of confirmed breeding on site, it is especially egregious to destroy this habitat.

Other bird species impacted
(There are a number of sensitive species that could be impacted. I'll just list two of them with the highest level of protection.)
• A federally **endangered** species, the Least Bell's Vireo, has high potential to occur on the site and also nests throughout Guajome Park.

• The White-tailed Kite, a raptor species designated fully protected in California, was observed on-site by the biologist who conducted surveys for the dEIR. The project would result in permanent impacts to over 8 acres of this species' foraging habitat. I18-2

Wildlife, general

The site is adjacent to Guajome Park which is part of the largest wildlife corridor in the area, as the park connects to the San Luis Rey River. This important detail was left out of the dEIR as was the required analysis. This project could have a negative impact on native wildlife, such as bobcats, that move between the park and the river. I18-3

Water quality

Two creeks lie downstream from the project site, the East Channel Creek to the north and Guajome Creek to the south, both of which drain to Guajome Lake. The City must ensure these waterways do not get impacted by polluted runoff and harm the wildlife species that depend on these water sources for survival. I18-4

Cultural

The Native American Heritage Commission reported positive results of Native American resources in the project area. Several local Luiseño tribes subsequently expressed concern about the project:
• San Luis Rey Band of Mission Indians; "Our Tribe has intimate knowledge about the many discoveries made throughout the Project Area and is aware of cultural resource sites within close proximity to the proposed Project." I18-5

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• Pechanga Band of Indians:"believes the possibility for recovering subsurface resources during ground-disturbing activities for the Project is extremely high."

Other possible concerns

• Removal of equestrian development standards
• High potential of sensitive paleontological resources on site

I18-5 Cont.

We cannot continue to destroy habitats while we watch the destruction of our planet. When will we learn?

Sincerely,

I18-6

Patte Hughes
5446 Elderberry Way
Oceanside, CA 92057

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Response to Comment Letter I18

Individual
Patte Hughes
January 10, 2025

I18-1 The commenter begins their letter expressing general opposition to the proposed project. This comment is noted. No response is required.

I18-2 The commenter summarizes analysis in the Draft EIR related to special status bird species expresses concern for bird species. The comment addresses general subject areas, which received extensive analysis in the Draft EIR, and for which mitigation was incorporated. Refer to Draft EIR Section 4.3, Biological Resources. This comment does not raise any issues related to the adequacy of the Draft EIR. No further response is required.

I18-3 The commenter expresses concern the Draft EIR does not acknowledge the adjacent Guajome Regional Park as a major wildlife corridor, the parks connection to San Luis Rey River, or impacts to native wildlife that move between the park and the river. In the Draft EIR Section 4.3, Biological Resources, the park connection to San Luis Rey River, as well as common species observed in the area are discussed under subsection 4.3.1, Existing Conditions. Refer to Response to Comment A3-15 for a summary and expanded discussion on the wildlife movement impact analysis provided in Section 4.3, Biological Resources, of the Draft EIR.

I18-4 The commenter expresses concern in regard to two creeks downstream of the project site and requests that the City ensure these waterways are not impacted by polluted runoff. Waterways in the area as well as analysis of potential project runoff impacts are provided in Draft EIR Section 4.9, Hydrology and Water Quality. The potential for runoff impacts to wildlife are addressed in Draft EIR Section 4.3, Biological Resources. With implementation of requirements and mitigation measures (see MM BIO-3) discussed in the EIR, impacts related to runoff would be less than significant. Please also refer to Response to Comment I6-2, addressing the commenter's concern over the possible risks of pollution via runoff to the downstream creeks and potential to impact wildlife species dependent on the waterways by providing an expanded discussion on the impact analysis provided in Sections 4.3 and 4.9 of the Draft EIR.

I18-5 The commenter references quotes from two tribes (San Luis Rey Band of Mission Indians and Pechanga Band of Mission Indians) related to potential resources in the project area (included in Appendix D, Cultural Resources Inventory Report). The commenter also states generally that they have concerns related to removal of equestrian development standards and a high potential for sensitive paleontological resources on site. Draft EIR Section 4.16 includes the CEQA required analysis and disclosure of the project's potential to have significant tribal cultural resource impacts. The City conducted Assembly Bill (AB) 52 consultation as described in Section 4.4 (Draft EIR, p. 4.4-9) and in Section 4.16 (Draft EIR, pp. 4.16-9 and 4.16-10). The agreed upon mitigation measures are included in the Draft EIR (Draft EIR, pp. 4.4-13 through 4.4-15) and are also referenced in Draft EIR Section 4.16 (Draft EIR, p. 4.16-11). Refer also to Response to Comment I27-29 below which describes that Section 4.4, Cultural Resources, of the Draft EIR has been revised to clarify that no other requests for consultation were received from Native American Tribal Representatives other than the Rincon Band and San Luis Rey Band (Draft EIR, p. 4.4-9) following City's formal notification, as shown in Chapter 3,

Errata, of the Final EIR and consistent with the discussion of tribal consultation presented in Draft EIR Section 4.16 (Draft EIR, pp. 4.16-9 and 4.16-10). In regard to the requested waiver of equestrian development standards proposed, please refer to Response to Comment I2-8 above for a detailed discussion. In regard to the potential of paleontological resources onsite, please refer to Response to Comment I4-6 above which summarizes the Draft EIR findings that the site has high potential to support paleontological resources and requires implementation of Mitigation Measure (MM)-GEO-1 to reduce potential impacts to paleontological resources to less than significant.

I18-6 The commenter concludes their letter by stating destruction to habitats should come to an end. The comment is noted as concluding the letter. As discussed in Section 4.3, Biological Resources, implementation of the proposed project would result in less than significant impacts to biological resources with mitigation measures incorporated, including as concerns habitat. This comment does not raise any specific issues related to the adequacy of the Draft EIR. Therefore, no further response is required.

Comment Letter I19

Robert Dmohowski

From: CRISTINA GOORCHENKO <cgoorche@icloud.com>
Sent: Friday, January 10, 2025 11:38 AM
To: Robert Dmohowski
Subject: Guajome Lake Road Development

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Warning: External Source

Dear Mr. Dmohowski,
My name is Cristina Lopez and I am a resident near Guajome Park. I drive down Guajome Lake Road to take my two rescue dogs to walk at Guajome Park. It is the main location for my family and I to relax and exercise. In addition to tearing down the natural coastal brush and wildlife habitat, anymore traffic down that road would be unsafe for kids and people walking. With the high-stress life that many people experience nowadays, wildlife and open spaces are vital to the physical and mental health of the community. Development on this land would absolutely ruin and devastate the natural habitat for people and animals alike. I do not support this development and will continue to stand against this project. I19-1
Thank you for your consideration,
Cristina Lopez
cgoorche@gmail.com
(760)717-1636

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Response to Comment Letter I19

Individual
Christina Goorchenko
January 10, 2025

I19-1 The commenter explains that they frequent Guajome Regional Park and expresses concern in regard to the loss of wildlife habitat and open space from development of the project and safety concerns from project-generated traffic along Guajome Lake Road. The commenter also expresses opposition to the project. Please refer to Response to Comment I5-1 above for a summary of impacts to biological resource discussed in the Draft EIR Section 4.3, Biological Resources, including avoidance and mitigation measures that would reduce potential impacts to less than significant. In regard to project-related traffic generation and associated safety concerns, please refer to Responses to Comments A2-13, I1-2, I2-5, and I1-3 above. Specifically, note that Guajome Lake Road would be improved over the length of the property frontage, connecting to Albright Street, approximately 1,200 linear feet. These improvements would include a 5-foot-wide parkway and a 5-foot-wide sidewalk. The internal private road would also include 5-foot-wide sidewalks (Draft EIR, p. 3-2).

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Comment Letter I20

Robert Dmohowski

From: DIANE HAWKINS <5roadrunners@cox.net>
Sent: Friday, January 10, 2025 1:31 PM
To: Robert Dmohowski
Subject: High density development Guajome Park

Follow Up Flag: Follow up
Flag Status: Flagged

Warning: External Source

Hello Mr Dmohowski, we are long time Oceanside residents of over 30 years living adjacent, right along the small upper pond in Guajome Park. We are asking the commission to reconsider building such a high density development so close to our beautiful Park. So many residents as well as visitors take pride in this jewel of a county park surrounded by wildlife. The people of Oceanside deserve to have their voices heard as there isn't much nature available to them. The destruction of our wildlife habitat as well as having compact homes crammed into a small parcel should be reconsidered. We are not against any new developments just this one that is very high density. Thank you for your consideration in this critical matter! Regards, Diane and Mike Hawkins

I20-1

Yahoo Mail: Search, Organize, Conquer

Page 2 of 2 in Comment Letter I20

Response to Comment Letter I20

Individual
Diane Hawkins
January 10, 2025

I20-1 The commenter explains they live adjacent to Guajome Regional Park, requests that the City reconsider building the high-density development close to the park, and expresses concern related to project-related wildlife habitat loss and a high density of homes within the project site. In regard to project-related habitat loss concerns, please refer to Response to Comment I5-1 above. In regard to concerns about project density, the project would not introduce high-density housing but rather single-family homes consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with existing residential developments in the area as discussed in Response to Comment I14-1. Please also refer to Response to Comment I2-8 above for a detailed discussion on project density concerns. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

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Comment Letter I21

Robert Dmohowski

From: Debbie Mastro <bunnee321@aol.com>
Sent: Friday, January 10, 2025 1:48 PM
To: Robert Dmohowski
Subject: Guajome Lake Homes

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Warning: External Source

I am opposed to the Guajome Lakes Home Development. My concerns are with the many waivers, environmental issues and the compatibility of the area with the addition of homes. The equestrian overlay should not be waived. And what about the wildlife movement corridor? There will be no safe crossing for the horses and riders with the additional traffic. Right now, we have multiple uncontrolled fires going on in California. What about safe evacuation with the additional homes? There are too many concerns for me to feel comfortable with this project. I21-1 I21-2

Debbie Mastro

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Response to Comment Letter I21

Individual
Debbie Mastro
January 10, 2025

I21-1 The commenter states opposition to the proposed project and expresses concern with waivers proposed, environmental issues, compatibility of the project with the area, and asks about wildlife movement corridor. The comment is noted as expressing opposition to the project. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis. For discussion regarding compatibility of the project with the area and proposed project waivers, including the Equestrian Overlay Standard, please refer to Responses to Comments I2-8 and I10-3 above. In response to environmental concerns, Draft EIR Chapter 4, Environmental Analysis, describes the potential environmental impacts of the project and recommends mitigation measures to reduce impacts. Potential environmental impacts identified in the Draft EIR are also summarized in Response to Comment I2-7 above. Response to Comment A3-15 above provides a summary of the wildlife corridor analysis provided in the Draft EIR.

I21-2 The commenter expresses concern that there will be no safe crossing for equestrian riders with the addition of project-related traffic along Guajome Lake Road. The commenter also references recent wildfires in Los Angeles and asks about safe evacuation for the proposed project. In regard to a crossing along Guajome Lake Road for equestrian riders, there are currently no pedestrian or horse crosswalks along Guajome Lake Road near the project frontage and none are proposed as part of the project. For a detailed discussion as to why a crosswalk is not proposed as part of the proposed project, refer to Response to Comment A2-13 above. However, note that a sidewalk will be provided along the project frontage. In addition, a detailed discussion regarding project traffic impacts and proposed road improvements are provided in Responses to Comments I1-2 and I1-3 above. Please refer to Response to Comment I4-4 above for a detailed discussion regarding evacuation routes for the proposed project.

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Comment Letter I22

Robert Dmohowski

From: Michelle K <mbohorquez23@gmail.com>
Sent: Friday, January 10, 2025 1:10 PM
To: Robert Dmohowski
Subject: Guajome Lake Road development

Warning: External Source

Dear Mr. Dmohowski,

As an Oceanside resident and avid runner around Guajome Park, I am concerned by the proposed high-density development next to the Park. I'm afraid this will hurt the wildlife and rare species there. I am grateful to have this park right by me to take daily walks or runs. I am an avid nature seeker, but having this would ruin the tranquil environment. I strongly oppose this proposed structure since it doesn't just hurt me; it also hurts the other residents and the meaning behind this beloved nature area. Also, please consider the air quality, which will negatively impact our area. I22-1

I hope you take this project off the table and consider my letter.

Kind Regards,

Michelle Kubicki (She /Her)

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Response to Comment Letter I22

Individual
Michelle Kubicki
January 10, 2025

I22-1 The commenter expresses concern that the high-density development next to Guajome Regional Park will negatively impact wildlife, rare species, air quality, and the park's tranquil environment. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The Draft EIR demonstrates that no significant impacts would occur as a result of the project with mitigation incorporated. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. As discussed in Section 4.1, Aesthetics, the project would not introduce high-density housing but rather single-family homes consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with the existing residential developments in the area. Please refer to Responses to Comments I2-8 and I14-1 for a detailed discussion on proposed project density and compatibility of the project with the surrounding area. In regard to wildlife and rare species concerns, please refer to Section 4.3, Biological Resources, of the Draft EIR and Response to Comment I5-1 above for a summary of biological resources analyzed in the Draft EIR, including avoidance and mitigation measures proposed. In regard to air quality concerns, a detailed analysis of potential air quality impacts is provided in Draft EIR Section 4.2, Air Quality. Please also refer to Response to Comment I2-5. Concerning tranquility, noise was addressed in Section 4.11 of the Draft EIR; no potentially significant impact was identified.

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Comment Letter I23

January 10, 2025

Rob Dmohowski, AICP Principal Planner
City of Oceanside Planning Division
300 North Coast Highway
Oceanside, CA 92054
Via Email: rdmohowski@oceansideca.org

Re: Adjacent Property Owner Comments on the proposed Guajome Lake Homes Project
TENTATIVE TRACT MAP (T22-00004); DEVELOPMENT PLAN (D22-00009); and DENSITY BONUS (DB22-00005)



Dear Mr. Dmohowski,

This letter is timely submitted during the Draft EIR Public Review Period for the proposed project identified above.

My husband, Adrian Jaffer, and I, Ann Laddon, purchased our home immediately adjacent to what is now the site of proposed project 18 years ago with the dream of retiring here. After selling our horse boarding facility, also bordering Guajome Regional Park (Guajome Park or Park), we were able to fulfill that dream.

We found this property while riding our horses on the Guajome Park trails—we loved its looks and location, and when it came up for sale, we immediately bought it. The home itself has an interesting history having been featured on the cover of a design magazine when it was built because of its progressive architecture, which includes passive heat capture and cooling. It is oriented to absorb heat from winter sun through its Trombe walls that passively heat the home. In the summer, the sun doesn't reach the Trombe walls, and instead, air flow passages draw cool air in, and direct the warm air up and out of the house. Open space around the home is critical for the proper functioning of these features.

I23-1

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Over the past two and a half years we have invested nearly $300,000 in deferred maintenance and upgrades: solar electricity and eco-friendly heating/air/water, as well as a new roof and major interior repairs and upgrades. We also restored the barn, fencing, and added corral shelters and a round pen, and added landscaping. Living here is indeed, more than we had even imagined, our dream come true. Our horses graze peacefully in the pasture and we have immediate access to the equestrian trails (our property, like several along Guajome Lake Road, includes a portion on the park side) and we maintain that access trail.

We are witness to the richness of the ecosystem: a pair of breeding American Kestrels perch in our trees along the property line; Roadrunners consider the northeast corner of our property to across the road and into the Park their territory; breeding Red tailed hawks; coveys of quail; dove; the endangered gnatcatcher, as well as Least Bell's Vireo, nest in the delicate riparian habitat on the north border of the proposed project site. There are bobcats, and the coyotes are abundant, keystone species that speak to the environmental quality and ecosystem health of the area.

I23-1 Cont.

And it is peaceful and quiet. Above, is a photo of a recent dawn at our property, looking southeast across the proposed project site. Now imagine 83 homes, shoehorned onto this portion of the parcel, reduced from 16 acres in a possibly vain attempt to protect the delicate riparian habitat. 83 homes, up to 332 cars on site (4 parking spots per unit), close to 261 individuals (83 homes x average of 3.15 occupants based on 2023 census – note this exceeds the number presented of 233 occupants in the DEIR (4.12-8)). The peace will be shattered, because of density exceeding the Oceanside Planning Regulations and the waiver of 7 regulations. The project's impact, in its current configuration, will forever damage this unique neighborhood, which the City of Oceanside's Planning Department had previously thoughtfully preserved, through a Scenic Park overlay and Equestrian overlay and low density lot design, which has also served as an ecological buffer zone for Guajome Park.

I23-2

We are not NIMBYs—we understand that a 16-acre parcel may not remain vacant forever, much though we wish it would. During the tenure of our ownership, we have seen several projects come and go—A recent one looked to build approximately 34 homes. I calculated that as approximately equal to the development in adjacent areas, e.g. Old Ranch Road homes, and across the Guajome Park in the Elsinore/North Santa Fe development. That is the maximum density appropriate for this area and even that exceeds current Oceanside Zoning for this particular area. Why wasn't this studied as an Alternative in the EIR? Or a project that does not require waivers?

I23-3

The impacts of the proposed project on our investment and personal lifestyle would be significant. The proposed development plan does not take into account the need to provide adequate visual and noise mitigation, both during construction and project occupancy, for our property. I was told that the developer is required to comply with Oceanside regulations regarding construction, but also that those regulations do not reflect the unique equestrian overlay where we live. How will that be addressed? Oceanside has a required equestrian overlay, but no requirements specific to how construction can occur in such areas. We are also concerned about how noise and night lighting during occupancy will affect the quiet enjoyment of our property. For all these reasons, we believe the DEIR's conclusion of less than significant effect to Aesthetics and Land Use and Planning are incorrect. These topics must be more fully addressed in the EIR.

I23-4

I23-5

I23-6

Particular impacts and dangers to us and our horses are tied to the improvement of the current dirt road. Our pastures run along the road property line, and we have concerns about construction and occupancy effects. During construction, it is critical that the project include protections from dust, kicked up stones, large equipment disruption, odors from asphalt, etc., as they can cause distress to horses. This includes project grading, as well as delivery of road materials, where materials can be kicked up, as well as when the materials are off-loaded it is extremely noisy, as well as intermittent, which startles horses. The same applies to the east

I23-7

property line that we share with the proposed project—our barn, upper pasture, and working arena/round pen, border that property line. The nature and number of construction vehicles and trips is also poorly described in the EIR and needs more detail. Further, would the section of road adjacent to our property have sidewalks, or is it too narrow? We would need protection between our pastures and the road – either mature landscaping, fencing, or both. Can this be made part of the site plan?

I23-7 Cont.

I23-8

The completed project would also irreparably damage our views, our solitude, the unobstructed eastern light, and the safety of our horses. We ask the project to include view protection and landscape buffers for our property. Visual simulations of the project from our property should be prepared so that effects can be properly determined. Already, the road is dangerous. Despite it being unpaved, the speed limit is set as if it were paved, at 25 MPH. We have put up courtesy signs on our property encouraging drivers to be considerate of the horses—and some people actually do slow down—but most don't and crossing the road with horses in hand is already dangerous. Imagine the road paved, with potentially 300+ more cars making close to a thousand trips daily, in a hurry to get to school, to work, to shop, and back home again. It is not an exaggeration to say that it will be a nightmare for us and all the animals that must cross the road to reach the Guajome Park. This also includes impairment of the functioning of the existing wildlife corridor and linkage, and promises increases in animal/car conflicts for both corridor dwellers and passage species. Has this been analyzed?

I23-9

I23-10

I23-11

Apart from the personal impacts this project, as proposed, would have on our property and lifestyle, we also have great concern for the delicate ecology represented in the riparian habitat and the wildlife corridor that the site provides. The current plan allows only a very narrow easement between our eastern property line and the at least 18 homes proposed to border us directly. We were informed it would be a mere 35 feet from our property line to the new homes. Can this be widened and be considered appropriate for wildlife movement? Despite segregating the riparian habitat and the endangered and threatened species nesting there, it is magical thinking to propose that nearly 300 individuals, especially those living in the small lot homes, will not spill over to, and damage, the habitat. What design elements, barriers, and signs will be put in place to dissuade entry of people into the riparian area yet still allow wildlife passage? And will there be an owner-occupied requirement? If not, there will be strong potential for more individuals to be living in one property—I reference a home at the top of Albright, owned by an absentee landlord, which has been a headache to the neighbors on our street as well as Oceanside Code Enforcement (excess cars, partying, trespassing, blocking driveways, and other illegal activities).

I23-12

For a project to work at all on this unique property, it would have to include at minimum, a wider distance between our property and the first line of houses including to create a legitimate, functioning wildlife corridor. Ideally, as I understand, another adjacent property on the east side of the site is under contract to be bought by the project applicant. If the homes could be shifted eastward, and the density decreased as a result, that would help reduce impacts. It goes without saying that there also needs to be a comprehensive landscaping plan the shields our sight lines from the project, as well as the road, especially during construction. The current landscaping plan presented in the DEIR is staggeringly inadequate. In fact, no landscaping is indicated on the shared property lines between the proposed project and our property, or our neighbor's home just north of us. The homes are placed as close to the property lines as codes allow, with absolutely no buffer or respect for the equestrian overlay on our property, and no corridor for animals to migrate between the riparian habitat and Guajome Park. The inclusion of mature trees and landscaping on the shared property lines, as well as a wildlife corridor buffer zone, is essential.

I23-13

I23-14

The City of Oceanside and the developer must also commit to improving the overall safety of the road. This, at minimum, should include installing a sufficient number of speed bumps or speed humps (wider with a gentler configuration) from the eastern edge of the proposed project all the way to the Guajome Park entrance with mirrors on the "S" bends. Families with children and dogs park along Guajome Lake Road to access the Park and

I23-15

3

crossing with small children and dogs is truly treacherous. Drivers currently use the dirt road section as a racetrack, and the City knows how many cars end up in the Park as a result of unsafe driving. Further, formal crosswalks should be installed into the Park at regularly utilized street parking areas; there also should be dedicated horse crossings—we are subject to the equestrian overlay, but it is often unsafe to cross the road into the Park. A posted speed of 15 MPH and the addition of speed bumps and crossings would provide a safety benefit to the entire community as well as our wildlife population, and we believe they are a non-negotiable addition to any development project, and in fact, they should already be installed on this stretch of road.

I23-15 Cont.

We respectfully request that a site plan be developed to achieve these neighbor and community benefits as either a revised project description or alternative to be studied in the EIR. We also believe this Neighbor and Community Benefit design could be an Environmentally Superior Alternative. For the reasons stated above, we would also like a Park Expansion Alternative to be studied that would add all or part of the project site to Guajome Park.

I23-16

Finally, we respectfully request that a point of contact for the community during construction be required as a condition of project approval so that issues during project construction may be effectively and swiftly addressed.

I23-17

We regret that our request for an extension of the comment period, submitted by our attorneys on Dec. 24, 2024, was denied. This proposed project is extremely complex, the DEIR massive, and the impacts and need to coordinate responses with multiple community groups and our neighbors, has been negatively impacted by the truncated time frame. The six-day extension built into the comment period was inadequate considering the multiple holidays that this comment period bridged.

Up until now, there has been minimal opportunity for public comment outside of a few community meetings. We welcome an opportunity to participate in discussions with the applicant, Planning Commission, and the City Council.

I23-18

Thank you for this opportunity to voice our concerns on the personal and community impacts this proposed project will cause. We look forward to receiving thoughtful responses to our comments.
Please place our letter in the administrative record and add us to the list to receive hearing notices and revised project documents.

Sincerely,

Ann M. Laddon and Adrian M. Jaffer, MD Ret.

I23-19

Response to Comment Letter I23

Individual
Ann Landon
January 10, 2025

I23-1 The commenter notes they are a homeowner who lives adjacent to the project site and describes their property and the maintenance work they have completed recently. In addition, they state that there is an incredible amount of wildlife in the surrounding ecosystem. This comment does not address the adequacy of the Draft EIR, and no response is required.

I23-2 The commenter asserts that placing 83 homes on the project site will adversely affect the peace of the area. The commenter suggests that the project could accommodate 332 cars and 261 residents. The comment also states that the neighborhood will be damaged because the proposed density exceeds the Oceanside planning regulations and the project requests waivers of seven regulations, and that the City's application of the scenic park overlay, equestrian overlay, and low-density lot design requirements have served to preserve the unique neighborhood. In response, please refer to Response to Comment I2-8 for a detailed discussion regarding the proposed density and requested waivers. In regard to the number of residents the project would support, Draft EIR Section 4.12, Population and Housing, estimates the project has the potential to house approximately 233 people based on the City's Housing Element calculation of an average household size of 2.8 persons per dwelling unit. In response, the project would provide two-car garages for each single-family home, which would include a full driveway for guest parking. Additionally, 32-foot-wide street sections are proposed, allowing for approximately 10 additional on-street guest parking spots. As outlined in Table 3.3-1 of the Draft EIR and updated in Chapter 3, Errata, of this Final EIR, the project is consistent with the City's parking standards. As detailed in Sections 4.11, Noise, and 4.15, Traffic and Circulation, of the Draft EIR, no substantial impacts related to noise or traffic and circulation were identified; therefore, no mitigation measures are required. Impacts related to noise and traffic and circulation would be less than significant.

I23-3 The commenter notes that a prior proposal for the project site would have constructed 34 homes, which the commenter calculates as being approximately equal to development in adjacent areas. The comment further states that placing 34 homes on the 16-acre site would provide the maximum density that is appropriate for the site and states that even 34 homes on this site would exceed the density allowed by zoning for the area. The commenter questions why the EIR does not evaluate an alternative meeting this maximum density and an alternative that does not require waivers.

In response, the commenter is incorrect that even 34 homes would exceed the density allowed by the zoning for the area. State Density Bonus Law allows the project to be developed at the density proposed by reserving a minimum percentage of the proposed dwellings for lower income households. A Reduced Density Alternative was considered but rejected from further evaluation because it was determined to be infeasible as it would not comply with Density Bonus Law and would not meet most of the project objectives (Draft EIR Section 8.3.2). Similarly, an Existing Land Use Designation Alternative was considered and rejected from further evaluation (Draft EIR Section 8.3.3). This alternative would develop the site under the site's land use and zoning designations and would not require development standard waivers. However, it would also be inconsistent with Density Bonus Law because this alternative would physically preclude the project from being built at the proposed density and

affordability without the application of requested waivers and would not be expected to reduce or avoid any of the project's environmental impacts. Refer also to Response to Comment O5-2, for an expanded discussion further addressing the commenter's question about the Draft EIR evaluating an alternative that does not require development standard waivers.

I23-4 The commenter states that the proposed development plan does not include adequate visual and noise mitigation both during construction and project occupancy and would adversely affect the commenter's investment and lifestyle. The Draft EIR analyzed both Noise and Aesthetics as a result of project implementation. Section 4.11 of the Draft EIR, Noise, identifies the City regulations that govern construction noise and explains that a more conservative threshold, taken from Federal Transit Administration guidance, was applied to the construction noise analysis to ensure a higher level of protection for nearby residents (Draft EIR, p. 4.11-7). The noise impact analysis demonstrates that no significant noise impacts would occur during construction or operation, and no mitigation measures are required. Additionally, in Section 4.1 of the Draft EIR, Aesthetics, impacts related to aesthetics as a result of project implementation are determined to be less than significant and no mitigation measures are required. Please refer to Response to Comment I2-8 above for a discussion of project consistency with character of the area and visual impacts analyzed in the Draft EIR. This comment does not identify a specific inadequacy of the Draft EIR, and no further response is required.

I23-5 The commenter questions how the developer would be required to comply with Oceanside regulations regarding construction in combination with the Equestrian Overlay. The Equestrian Overlay District does not address construction activities. The intent of the equestrian overlay is to provide for recreational opportunities and establish design standards and criteria that accommodate keeping and protection of horses on private property. Meeting this intent does not require unique construction standards. As discussed in Responses to Comments I2-8 above and O5-5 below, the project is requesting a waiver for the Equestrian Overlay District standards. The Draft EIR noise impact analysis found that construction noise levels would be below the applicable regulatory standards, including the City's construction regulations, and thus impacts would be less than significant. City noise regulations, such as limiting construction hours, are outlined in the Draft EIR at Section 4.11.2 and Chapter 38 of Oceanside Municipal Code.

I23-6 The commenter expresses concern regarding noise and night lighting during occupancy and asserts that the Draft EIR conclusions that the project would not have significant impacts related to aesthetics or land use and planning are incorrect. As discussed in Responses to Comments I23-4 and I23-5 above, Section 4.11 of the Draft EIR, Noise, found that the project would not result in any significant noise impacts because noise levels would remain below the applicable thresholds. Once operational the proposed project would not produce groundborne vibration, significant increases in traffic noise, or significant increases in community noise, such as from use of heating, ventilation, and air conditioning systems In response to nighttime lighting, please refer to Response to Comment A2-15, which summarizes how the project would comply with the City's light regulations. Specifically, lighting features would consist of energy-efficient lighting that would be fully shielded and directed downward to minimize light trespass onto surrounding properties and Exterior lighting would be turned off during daylight hours. Through compliance with the City Municipal Code, proposed outdoor lighting would not substantially affect day or nighttime views (Draft EIR, p.4.1-9). This comment and the preceding comments do not specify in what way the Draft EIR conclusions regarding aesthetics and land use and planning impacts are incorrect. Draft EIR Section 4.1, Aesthetics, found that the project would be visible

from adjacent parcels and may be visible from some distant public viewpoints but that it would be visually consistent with surrounding residential developments. Please refer to Response to Comment I2-8 above for a discussion of project consistency with character of the area and visual impacts analyzed in the Draft EIR. The analysis in Draft EIR Section 4.10, Land Use and Planning, demonstrates that the project would not divide an existing community and that the project would be consistent with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. This includes a detailed evaluation of consistency with the City's General Plan, presented in Draft EIR Table 4.10-1.

I23-7 The commenter states that improvement of Guajome Lake Road and other construction activities will pose danger for the commenter's horses. The commenter specifies that during construction, the project must provide protection from dust, kicked up stones, large equipment disruption – including grading and delivery of construction materials, and odors from asphalt, noting that intermittent noises associated with materials being unloaded from trucks can startle horses. The comment also states that the Draft EIR should provide more detail on the nature and number of construction trips. In regard to dust concerns from construction and occupancy effects, please refer to Response to Comment I2-5 above, which explains that dust emissions during construction would be controlled by watering the active construction areas, restricting vehicle speeds on unpaved roads/surfaces, halting all grading and excavations if wind speeds exceed 25 miles per hour, and clearing dirt spilled on paved surfaces daily. Potential on-site odor generators would only be expected during short-term construction activities such as from vehicles and/or equipment exhaust emissions during construction of the project, as well as during paving and application of architectural coatings. However, the odors would be considered short term and would not result in significant impacts. Specifically, the paving phase and architectural coatings phase are each expected to require one month to complete (Draft EIR Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report, p. 27). During project operation, activities associated with the proposed residential development would not result in any long-term odor impacts. Details regarding the construction process, including the number and type of vehicle trips during construction is provided in Draft EIR Section 4.2, Air Quality, specifically in Table 4.2-6. This table has been revised to clarify the additional haul trucks to export excess earthwork material and soils during construction. These additional haul trucks would not cause a new or significant impact under CEQA than was not already evaluated in the EIR. Text revisions to Section 4.2 of the Draft EIR are shown in ~~strikeout~~/<u>underline</u> in Chapter 3, Errata, of this Final EIR. The Draft EIR demonstrates that the project would not have significant impacts related to increases in ambient noise levels, both temporary (construction) and long-term (on-site and traffic generation) in Section 4.11, Noise.

I23-8 The commenter requests clarification on whether sidewalks are proposed for the improved section of Guajome Lake Road. The commenter states that their pastures would need protection from the road, such as through mature landscaping or fencing and questions if this can be made part of the site plan. The project would pave the segment of Guajome Lake Road along the project site frontage and extending west to Albright Street, approximately 1,200 linear feet; this road section would include a 5-foot-wide sidewalk on the northern side of the road. The proposed sidewalk improvement would not encroach on to private property. The comment does not specify in what way the paved road section and sidewalks would harm the commenter's pasture. The Draft EIR demonstrates that the project would not have significant impacts related to air quality, noise, or hazards that would warrant a mitigation measure requiring the developer to provide landscaping or fencing on a neighboring property.

I23-9 The commenter states that the project would damage their views and put their horses' safety in jeopardy. The commenter requests that the project include view protection and landscape buffers and asserts that a visual simulation of the views of the project from the commenter's property should be included in the EIR. Please refer to Response to Comment I2-2 for a detailed discussion regarding views, which notes that the project would be visually consistent with surrounding residential developments and would use architectural styles and materials consistent with those of neighboring homes. Building heights would be limited to 25 feet per the development standards of the Scenic Park Overlay Zone. Further, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses. The City's development standards do not require landscape buffers for residential projects adjacent to existing residential land uses. In evaluating views and potential aesthetic impacts, CEQA requires consideration of publicly accessible viewpoints, such as views from Guajome Lake Road and Guajome Regional Park, and does not require consideration of private views. Residential uses are generally considered compatible with equestrian uses, and perimeter fencing and retaining walls will ensure separation from existing equestrian uses in the surrounding area. In regard to horse safety concerns crossing Guajome Lake Road, please refer to Response to Comment A2-13.

I23-10 The commenter states that Guajome Lake Road is already dangerous, has too high of a speed limit for a dirt road, and that paving the road as a result of project implementation will encourage people to go even faster, making safety a bigger concern, especially for people trying to cross the road with their horses to use the trails in Guajome Regional Park. As noted in Response to Comment I23-8, the project would pave the segment of Guajome Lake Road along the project site frontage and extending west to Albright Street, approximately 1,200 linear feet. The speed limit for the entire road would remain at 25 miles per hour and it would be speculative to assume that paving a segment of this road would affect traffic speeds. As discussed in Appendix K, Draft Local Transportation Assessment, Guajome Lake Road currently carries approximately 744 average daily trips (ADT) and the project would generate an additional 830 ADT, with 50% of the project-generated traffic expected to travel west on Guajome Lake Road and 50% expected to travel east on Guajome Lake Road. The total traffic volume on each segment of Guajome Lake Road would be within the Level of Service "C" capacity of 2,200 daily trips (Draft EIR Appendix K, pp. 13 and 14) and thus would meet the City's roadway safety and operation standards. Note that a correction has been made to Table 4.15-6, Existing Plus Project Street Segment Operations, to reflect the correct "exiting plus project" traffic volume for the roadway segment identified in that table. Revisions are shown in ~~strikeout~~/underline for Section 4.15, Traffic and Circulation, of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR). For further discussion related to project-generated traffic on Guajome Lake Road, refer also to Response to Comment I1-2 above. Additionally, upgrading Guajome Lake Road to meet fire code standards, paving the road, and adding sidewalks and bike lanes, would enhance safety by improving road structure and providing more defined spaces for pedestrians and cyclists. The implementation of these improvements, with the input of the Oceanside Fire Department and City Engineers, is intended to balance both speed control and safety, ensuring the road serves all users while meeting necessary standards for fire safety and emergency access. In regard to pedestrians or equestrians crossing Guajome Lake Road, please refer to Response to Comment A2-13.

I23-11 The commenter expresses concern that the project would adversely affect an existing wildlife corridor and increase conflicts between animals and cars. Please refer to Responses to Comments A3-15 and A3-16for a detailed response regarding the existing wildlife corridor, which is associated with the riparian habitat in the northern portion of the project site. Since the proposed development would be located between this wildlife corridor and the road, animals using the wildlife corridor would be less likely to use Guajome Lake Road after project implementation than under the current condition and thus the project would not substantially increase conflicts between animals and cars.

I23-12 The commenter expresses concern about the impacts of the project on the riparian habitat and wildlife corridor onsite and requests that the 35-foot easement between their property and the proposed homes be expanded to better support wildlife movement. They seek details on the design elements, barriers, and signage that will be implemented to prevent human intrusion into the riparian habitat. Additionally, they inquire whether there will be an owner-occupied requirement for the homes to prevent overcrowding and associated nuisances. The proposed 35-foot-wide easement on the western side of the project site is limited to the southernmost proposed parcel, Lot B, which would support a bioretention basin and sewer lift station. The easement would allow access to these facilities for maintenance. Please refer to Responses to Comments A3-15 and A3-16 above regarding the project's preservation of the riparian habitat onsite and effects on wildlife movement. In particular, Response to Comment A3-15 explains that the project site is located outside of the Wildlife Corridor Planning Zone designated by the Subarea Plan and finds that the project would not result in the loss of wildlife corridors or habitat linkages (Draft EIR, p. 4.3-21).

To prevent residents from entering the riparian habitat Draft EIR Section 3.2.5, Project Design Features, has been revised to include Project Design Feature (PDF)-BIO-1, which notes that a wall would be constructed along the northern development perimeter where a slope will be created, fencing would be placed around the remaining interface between development and open space area to prohibit access to the preserved riparian area, and that the Home Owners Association (HOA) would be responsible for removing trash and prohibiting trespassing in the open space area. Revisions to Draft EIR Chapter 3, Project Description, and Section 4.3, Biological Resources are shown as ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. Regardless of the number of people occupying any particular residence, access to the preserved riparian area will be prohibited.

The Draft EIR provides a complete analysis of the project's environmental effects based on the City's average population per household, which is based on citywide data. Thus, to the extent that dwelling units occupied by non-owner tenants might have a higher household size than owner-occupied units, this is reflected in the data upon which the impact analysis is based. As described in Section 4.12, Population and Housing, of the Draft EIR, the proposed 83 residential units would result in an increase of approximately 233 people at the project site (about 2.8 people per single-family home). Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). Speculation about future tenants that would cause overcrowding is not a proper basis for CEQA analysis. Additionally, CEQA does not require consideration of the type of nuisances mentioned in this comment.

I23-13 The commenter suggests that for a project to work on this property, a wider distance between the commenter's property and the adjacent houses is needed to ensure a functioning wildlife corridor. Please refer to Responses to Comments A3-15 and A3-16 for a detailed response regarding to potential impacts on local wildlife movement. The southern portion of the project site supports non-

native grassland and does not function as a wildlife corridor. As noted in Response to Comment I23-12, the project site is located outside of the Wildlife Corridor Planning Zone designated by the Subarea Plan and the project would not result in the loss of wildlife corridors or habitat linkages (Draft EIR, p. 4.3-21).

I23-14 The commenter suggests shifting the project eastward and decreasing the density, noting that the project applicant is believed to be under contract to purchase the property immediately east of the project site. They also assert that the current landscaping plan presented in the Draft EIR is inadequate noting that there is no proposed landscaping along the project site's western boundary and stating that landscaping should be provided to shield the commenter's sight lines from the project and the road and to provide a wildlife corridor. The project proposes development of a single existing parcel. It would be speculative to assume whether the project applicant would be successful in purchasing the neighboring property; and thus, it would not be appropriate under CEQA to evaluate an alternative that shifts the development footprint onto that adjacent property. An alternative location was thus considered but rejected in the Draft EIR, Section 8.3.1. Further, the adjacent property is already developed. Regarding decreasing the density, as discussed in Response to Comment I23-3, a Reduced Density Alternative was considered but rejected from further evaluation because it was determined to be infeasible and would not meet most of the project objectives (Draft EIR Section 8.3.2). The comment is correct that there is no proposed landscaping along the project site's western boundary. This is because the rear yards of residential lots would be landscaped individually by homeowners. As noted in this comment, placing the lot lines along the existing property boundary is permitted by the City's Zoning Ordinance. The City's regulations do not require landscaping to shield views of new development projects, and as noted in Response to Comment I23-9, CEQA requires consideration of publicly accessible viewpoints, such as views from Guajome Lake Road, and does not require consideration of private views. The project would be required to comply with Article 3049, Urban Forestry Program, of the City's Zoning Ordinance. The Urban Forestry Program requires new development over 1 acre in size to provide a minimum tree canopy area of 12% and a minimum permeable surface area of 22%. The project would satisfy these requirements, as shown in Draft EIR Table 3.3-1 (updated in Chapter 3, Errata, of this Final EIR). Please refer to Responses to Comments A3-15, A3-16, and I23-12 regarding potential impacts on local wildlife movement.

I23-15 The commenter suggests that the developer should focus on improving the overall safety of Guajome Lake Road, offering several recommendations for safety measures such as speed bumps and crosswalks. In response, as previously noted, Guajome Lake Road does not currently meet fire code standards. However, as outlined in Draft EIR Chapter 3, the project will include paving the road and bringing it up to fire code standards. The improvements will include road upgrades such as curb enhancements, 5-foot-wide sidewalks, and circulation and emergency access drives, which have been designed in collaboration with the Oceanside Fire Department. These improvements will ensure a minimum 28-foot width, with designated truck turnarounds and key staging areas throughout the project site. These improvements would overall enhance the safety of Guajome Lake Road. Please refer to Response to Comment I23-10 regarding the speed limit and operational capacity of Guajome Lake Road and Response to Comment A2-13 regarding pedestrians and equestrians crossing the road. The proposed improvements to benefit the broader community as concerns existing conditions or Park access exceed the scope of project impacts and, therefore, are not required.

I23-16 The commenter requests that a site plan be developed to achieve the neighbor and community benefits that they have suggested as either a revised project description or alternative to be studied in the Final EIR. The commenter also requests analysis of a Park Expansion Alternative. As discussed in Draft EIR Chapter 8, Alternatives, several alternatives to the proposed project were considered pursuant to CEQA and evaluated for their ability to meet the basic objectives of the project while reducing or avoiding the environmental impacts of the project. The alternatives were also assessed for feasibility. Under case law and CEQA Guidelines Section 15126.6(f), the discussion of alternatives is subject to a rule of reason and need not be exhaustive. Thus, it is not necessary to evaluate every potential alternative. Responses to Comments I23-9 and I23-12 through I23-15 explain why the neighbor and community benefits suggested in this comment letter do not address environmental impacts as defined by CEQA, and/or would not reduce or avoid the project's environmental effects, and/or would be speculative. Please also refer to Response to Comment A3-12 above. A Park Expansion Alternative would not meet basic project objectives, including objectives 2, 3, or 4. It is also infeasible in light of economic, social, and legal considerations, including that Density Bonus Law allows the project density and speculation as to park acquisition. Such an alternative would also not comply with the existing residential General Plan Land Use or zoning designations. The alternative is therefore rejected from further consideration for not meeting basic project objectives and for infeasibility. CEQA Guidelines Section 15126.6(f) provides that an EIR need not consider a project alternative whose effects cannot be reasonably ascertained, whose implementation is remote and speculative, or whose execution does not substantially lessen or avoid the significant effects of a proposed project. As disclosed in the Draft EIR, in determining an appropriate range of project alternatives to be evaluated in this Draft EIR, a number of possible alternatives were initially considered and then some were rejected. The analysis discloses whether those alternatives meet project objectives and whether they would have potentially lesser, the same, or greater significant impacts. Thus, the Draft EIR adequately satisfies CEQA's requirement to evaluate a reasonable range of alternatives.

I23-17 The commenter requests that a point of contact for the community during construction be required as a condition of project approval so that issues during project construction may be addressed efficiently. Identification of a point of contact to address community concerns during construction has been incorporated in Draft EIR, Section 3.2.5, Project Design Features, as ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. In addition, the City Engineering Division standard Conditions of Approval require the owner/developer to develop and submit a draft neighborhood-notification flier to the City for review. The flier shall contain information on the project, construction schedule, notification of anticipated construction noise and traffic, and contact information. Prior to the issuance of a grading permit, the approved flier shall be distributed to area residents, property owners, and business owners located within a 300-foot radius area of the project.

I23-18 The commenter states that their request for an extension of the comment period was denied and state that there has been minimal opportunity for public comment outside of the community meetings. CEQA requires a 45-day public review period for a Draft EIR. The City provided a 51-day public review period for this project's Draft EIR. Thus, the City complied with CEQA requirements. Additional opportunities for public comment will be provided during the Planning Commission hearing regarding the Final EIR and the project. Refer to Response to Comment I2-3 for additional discussion of public comment opportunities. This comment does not raise any issues related to the adequacy of the Draft EIR, and therefore no further response is required.

I23-19 The commenter concludes their letter with closing remarks and expresses gratitude for the opportunity to voice their concerns on the personal and community impacts they believe the proposed project will cause. In response, this comment does not raise any issues related to the adequacy of the Draft EIR, and therefore no further response is required.

Comment Letter I24

Robert Dmohowski

From: Ursula Sack <guard-nc@cox.net>
Sent: Friday, January 10, 2025 2:57 PM
To: Robert Dmohowski
Subject: Guajome Lake Road development

Warning: External Source

Dear Mr. Dmohowski and CIty of Oceanside officials,

Guajome Alliance for Responsible Development (GuARD) is a neighborhood organization that advocates for the preservation of rural lands within the Guajome neighborhood, which encompasses parts of San Diego County, Oceanside, and Vista. GuARD members have lived in this area for decades, and know it well. It is of significant concern to GuARD that the Draft EIR for the proposed development on Guajome Lake Road fails to take into account, or address in any substantial way, the semi-rural nature of the property and its surroundings. I24-1

The property borders Guajome Regional Park, yet there is little information about how the developers would actually succeed in making such a dense development compatible with the conditions—recreational, scenic, environmental, habitat preservation--that the park provides as a benefit to San Diego County residents. The loss of the equestrian overlay would, in particular, have a negative impact on the local residents who use the park for equestrian recreational activities. I24-2

The fact is, that this project is completely out of character with the rural nature of the area. The EIR describes the property inaccurately, saying that it is within one-tenth of a mile from the boundary of the City of Vista on the east. The property is within rural land uses on all sides. To the east it borders unincorporated San Diego County properties, with large lot residences adjacent, and agricultural uses further east on Guajome Lake Road. To the west, the properties it borders are within Oceanside but they too are semi-rural large lot residences. The north side of the property is open space riparian habitat, and the south side is the open space of Guajome Regional Park.

The EIR claims that this development is "infill" development. Infill is generally considered to be within an urban environment, not in a rural environment such as this. Infill is often utilized to provide housing for low-income residents who depend on public transportation, but the residents on this property would need to walk 1.3 miles before they came to a bus stop. Therefore it is reasonable to predict that cars, not public transportation, would be the means used by the residents there. I24-3

The project developers would require significant waivers of environmental standards in order to provide the planned affordable housing. But a paltry 5% of the units—only 4 homes—would be provided. The increased density, and loss of important building standards in this neighborhood, is far too great a price to pay for such a small number of affordable units. Surely the City of Oceanside can find other ways to provide greater numbers of affordable housing units, that would be appropriate for residents requiring easy access to public transportation and other needs such as grocery stores. I24-4

Another factor that is completely disregarded by the EIR, are problems regarding the section of Guajome Lake Road going southeast from the property, through County land, to Osborne Street. Surely a significant number of residents of the new development would drive this section of roadway. There are two major problems: first, part of the road is dirt and will raise dust as many drivers go through, yet the EIR does not indicate that improvement of this road would be necessary. I24-5

1

The second problem, though, might very well be made even worse if that section of road were improved. Any increased traffic on this rural County road would have a significant impact on its current residents, given that noise, pollution, and unsafe (fast) driving would increase. In addition, bad conditions on Osborne Street would be significantly worsened. During rush hours, this stretch of road is overburdened by traffic coming off of North Santa Fe Avenue. Cars are frequently backed up at the intersection of Guajome Lake Road, making it dangerous for residents to turn onto or off of Osborne. Osborne is notorious for dangerous conditions due to too many drivers going too fast through this semi-rural neighborhood. The City of Oceanside must make it a priority to address this situation before approving further development in this area. I24-6

Thank you for your consideration of our concerns, I24-7

Ursula Sack

Secretary/Treasurer
Guajome Alliance for Responsible Development

guardnc.org

Response to Comment Letter I24

Individual
Ursula Sack
January 10, 2025

I24-1 The commenter begins with introducing their neighborhood organization for rural lands and long-term residency in the area of the proposed development. The commenter suggests that the Draft EIR fails to address the semi-rural nature of the property and its surroundings. In response, please refer to the narrative and graphics provided within Draft EIR Chapter 3, Project Description, as well as the existing setting and environmental analysis provided throughout Draft EIR Chapter 4, Environmental Analysis. In particular, the rural character of the project area and the compatibility of the project are discussed in Draft EIR Section 4.1, Aesthetics, and Section 4.10, Land Use and Planning, and support the Draft EIR's good faith effort at full disclosure of the project's potentially significant impacts under CEQA related to compatibility with the surrounding area. Please also refer to Response to Comment I2-8 above for a summary of the project's compatibility with the area and land uses.

I24-2 The commenter suggests that the proposed development, adjacent to Guajome Regional Park, provides little information on compatibility within recreation, scenic, environmental, and habitat preservation conditions. Guajome Regional Park is discussed throughout applicable sections in Draft EIR Chapter 4, Environmental Analysis, including Section 4.1, Aesthetics; Section 4.3, Biological Resources; and Section 4.14, Recreation. For a summary of how the project would blend with the surrounding area, refer to Responses to Comments I2-8 above. For a summary of the biological resources impact analysis, avoidance, and mitigation measures, please refer to Response to Comment I5-1 above. The ability of the project to provide adequate parks and recreation facilities to serve the project demand is addressed in Section 4.14, Recreation. Please also refer to Response to Comment A2-16 above for additional discussion related to potential impacts to Guajome Regional Park analyzed in the Draft EIR.

The commenter also expresses concern over the requested waiver for equestrian overlay standard and suggests it would negatively impact residents who use the park for equestrian recreational activities. As stated in Section 4.14.4 of the Draft EIR: "The project requests waivers from the Equestrian Overlay District development standards. The project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses in the surrounding area." The proposed project would not impact existing equestrian facilities in the surrounding area, including equestrian use of Guajome Regional Park. Therefore, implementation of the project would not stop existing residents from being able to use the existing park for equestrian recreational activities.

I24-3 The commenter expresses concern over the project being out of character with the rural nature of the area. The comment also states that the Draft EIR inaccurately describes the property as being within one-tenth of a mile from the boundary of the City of Vista, while it is surrounded by rural land uses on all sides. Please refer to Response to Comment I2-8 above for a summary of the project's compatibility with the area and land use. The EIR accurately discloses the project site's surrounding land uses throughout the document. For instance, Draft EIR Section ES.2.1 states the project site is surrounded by residential development and open space. Also refer to Draft EIR Figure 3-2, Existing Project Site. The error related to the project site's distance from the City of Vista boundary has been corrected. As indicated in Chapter 3, Errata, of this Final EIR, text revisions to the Draft EIR are indicated with

~~strikeout~~/underline in this Final EIR (refer to Chapter 3, Errata) to reflect that the City of Vista boundary is 0.5 miles east of the project site.

I24-3 The commenter also states that the project is described as an infill development, which generally falls under an urban environment and not a rural one. The commenter argues that the infill development is typically used to provide housing for low-income residents who depend on public transportation, which is not feasible in this rural area. In response, the project would be considered to meet the definition of "infill development" because it proposes 83 residential units in an urbanized area within unused and underutilized land containing a vacant residential structure and driveway, abutting other existing residential developments in the surrounding area. Refer to page 4.1-7 of the Draft EIR. Section 4.15 of the Draft EIR evaluates the project's impact related to traffic and circulation, which evaluating vehicle miles traveled, as well as bicycle, pedestrian, and transit facilities. Please also refer to Response to Comment I27-30 below. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. No further response is required.

I24-4 The commenter expresses concern about the projects affordable housing component and the waivers of building standards required to achieve it. The proposed project would be eligible to request waivers for development standards related to building height, setbacks, lot ratios, etc., at the density proposed to accommodate affordable units under the state Density Bonus Law. Please refer to Response to Comment I2-8 above for detailed discussion related to waivers requested to accommodate affordable housing. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I24-5 The commenter expresses concern that the EIR disregards the unpaved section of Guajome Lake Road southeast of the project site and associated dust. Please refer to Response to Comment I2-5 above. Specifically, project-generated operational dust impacts were analyzed in Draft EIR Section 4.2, Air Quality, and Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report. CalEEMod modeling for the project has been updated to include emissions calculations for project-generated vehicle travel along the 800-foot segment of unpaved Guajome Lake Road southeast of the project site. The revisions apply to Draft EIR Section 3.2.5, Project Design Features, and Draft EIR Section 4.2, Air Quality, with text additions and revisions shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. As indicated in Chapter 3, Errata, of this Final EIR, the revised modeling assumptions associated with fugitive dust related to project-related travel on this unpaved segment of Guajome Lake Road would result in an increase in PM_{10} and $PM_{2.5}$ emissions during operation of the project. However, PM_{10} and $PM_{2.5}$ emissions during operation of the project would remain below the SDACPD emission-based threshold. Therefore, consistent with the analysis in the Draft EIR, impacts associated with project-generated operational criteria air pollutant emissions would remain less than significant with mitigation incorporated (Mitigation Measure [MM]-AQ-2). The additional analysis further supports the original impact conclusion in the Draft EIR associated with operational criteria air pollutant emissions. Which is to say, the project would not result in significant impacts related to dust along this roadway.

I24-6 The commenter suggests that, even if improvements were proposed for the unpaved segment of Guajome Lake Road located southeast of the project site, project-related traffic would have a significant impact related to noise, pollution, and an increase in fast driving. The Draft Local Transportation Analysis (LTA) (Appendix K) shows the proposed project would not add a substantial traffic volume to Guajome Lake Road to require improvements, as further describe below in Response to Comment I24-

7. Draft EIR Section 4.11, Noise, found that, once operational, the project would result in a less than significant increase in traffic-related noise. Refer to Response to Comment I24-5 above, addressing impacts associated with project-generated operational criteria air pollutant emissions that would be less than significant with mitigation incorporated. Regarding existing speeding on Osborne Street or Guajome Lake Road, the speed limit would not change with project implementation and it would be speculative to assume that paving a segment of road would affect traffic speeds.

I24-7 The commenter suggests that Osborne Street has dangerous conditions due to fast drivers and that cars are frequently backed up at the intersection of Guajome Lake Road during rush hour and asks that the City address this situation before approving further development in the area. As described in the Draft EIR, improvements to the segment of Guajome Lake Road located southeast of the project site are not proposed as part of the project. The Draft LTA (Appendix K) shows the project would not add substantial traffic volume to Guajome Lake Road to require additional off-site improvements. As shown in Table 4.15-8 of Section 4.15 (Draft EIR, pp. 4.15-15 and 4.15-16), the study area street segment is calculated to operate acceptably at level of service (LOS) D or better with and without the addition of project-generated trips; therefore, based on the City's traffic thresholds and methodology, and per discussion with City staff, additional off-site roadway improvements to Guajome Lake Road are not required of the project, including the unpaved portion of Guajome Lake Road located southeast of the project site. However, the project will be required to pay its fair share of thoroughfare and traffic fees totaling $300,128 (assuming current rate of $3,616/unit). These fees are intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process.

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Comment Letter I25

Rob Dmohowski, AICP, Principal Planner
City of Oceanside
Planning Division
300 North Coast Highway
Oceanside, CA 92054

January 10, 2025

Dear Mr. Dmohowski,

This letter is in regard to the high-density development planned for the 16.65-acre lot, parcel 1574121500 north of Guajome Lake Road. I am a local resident, in the same neighborhood, and have direct ties to the park and the people and horse community who regularly frequent Guajome Park open space. I have a degree in geography/environmental management, and I would like to put forth my concerns regarding this planned development. I25-1

According to the city of Oceanside Master Plan, this location has the land use code of RS-SP-EQ (Single-Family Residential – Scenic Park Overlay – Equestrian Overlay) being situated next to the Guajome Lake Open Space preserve. The land use designation is intended to promote orderly development of single-family residences in a manner that will be compatible with surrounding properties and the protection of their values. The proposed development is completely out of character with the current designation.

The proposed development of 83 single family homes on less than 9 acres allots an average of only 3000 square feet of land to each home, significantly less than the residences in the adjacent equestrian lots on both sides of the development that have from 1 to 3 acres each. Also significantly less than the community directly east, Spring Creek, which includes lots of under .5 acre each. The proposed development will not only destroy the surrounding neighborhood but will also cause grief to the residents and their animals by the sheer number of proposed residents. I25-2

According to the general plan, the number of SF residences allowed per acre is 5.9 units. If the allowable development area is approximately 6 acres, allowing for native habitat preservation, the number of allowable units on the property is limited to approx. 36 homes. That is the maximum number allowed. The faulty calculations on the EIR allow for 5.9 units on net site acreage of 12.45 acres. The "net site acreage" would include the area designated as California Gnatcatcher habitat. This is completely unacceptable. The proposal also includes a "density bonus" of 15 additional units on top of the erroneously calculated 74 base units for a total "allowable" development of 89 units. These calculations are directly opposed to the original intent of the land designation, the character of the open space and equestrian designations, and removes all protections for the endangered species. I25-3

The subject property includes a significant portion of habitat to environmentally sensitive species, including the Coastal California Gnatcatcher and our dwindling California Coastal Sage Scrub. The northern portion of the site is also designated Hardline Preserve by the Oceanside Subarea Plan. I25-4

The maximum developed area should be no larger than which can be accommodated on the already disturbed area of grassland, which would be in accordance with the comments received from the USFW. This must be protected. The proposed mitigation area at the Lake Calaveras site will not make up for the damage to the local habitat. I25-5

According to the EIR, the amount of traffic generated by these development plans, at even 10 trips per day per residence, would add over 830 trips in and out of the development, all along a designated open space that is not designed for that amount of traffic. Remember to include the amount of chemicals produced by these and the damage that will occur to the vegetation in the park and to the air quality of those using the park for recreation, camping, and equestrian activities. I25-6

I would like to address the very important impact the added residents will have on the local equestrian community and horses. There are several long-standing equestrian facilities along Guajome park road, and one large stable facility directly adjacent to the park. Guajome park is one of the last local facilities we have available for horses and their owners to use for exercise and outdoor enjoyment. The traffic generated by the large number of smaller residences will directly endanger the existing equestrian community. Particularly smaller homes would include most people unfamiliar with horse etiquette and the dangers involved with being unaware of horse behavior. I25-7

The alternative options proposed by the developer are intended to be less attractive on several levels so as to promote their main objective of making as much money as possible in total disregard for the consequences to the surrounding community. I understand there was an initial project proposed with single family/equestrian homes on large lots. Where did that proposal disappear to? I object to the numerous requests to obtain waivers to all the protections that have been set in place for the local residents. This should not be allowed. I25-8

In conclusion, I would respectfully request that the proposed development and all its alternatives be rejected in accordance with the current housing designation, the open space and land use of the park, the local community, the environmental protections, and the horses and owners who frequent the park. Please note there are other housing developments in the area, including one just off of Osborne Street to the south. We are not lacking for housing. There are plenty of infill opportunities in the coastal parts of Oceanside that do not negatively impact the protected environments and lifestyle we cherish in this community. Please consider the negative impacts of this proposal and request this developer prepare a plan that is in accordance with the current guidelines and protections that have been put in place by our esteemed leadership for the health and protection of our community. I25-9

With respect,

Diane H. Rachels
920 Barsby Street
Vista, CA 92084

Response to Comment Letter I25

Individual
Diane Rachels
January 10, 2025

I25-1 The commenter begins their letter expressing concerns about the high-density development and states they are a local resident that frequents Guajome Regional Park. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required. Regarding concerns about project density, refer to Responses to Comments I2-8 and I14-1 which discuss that the project would not introduce high-density housing but rather single-family homes consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with the existing residential developments land use in the area.

I25-2 The commenter summarizes the current general plan land use designation for the project site and states that the project is out of character with the current land use designation. In addition, the commenter compares the average square footage of residential lots proposed for the project to larger residential lots located east and adjacent to the project site and expresses concern that the proposed project density will destroy the existing neighborhood and cause grief to existing residents and their animals. Please refer to Response to Comment I2-8 above for a detailed discussion on the project's compatibility with the area and density proposed. The project density is permitted by the state Density Bonus Law and, under state housing laws, not inconsistent with land use, zoning, or other policies or regulations by virtue of a density bonus or waiver (Gov. Code, § 65589.5 (j)(3)). The aforementioned issues have been adequately disclosed and addressed in the Draft EIR. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I25-3 The commenter points out that the allowable residential square footage per acre is 5.9 units under the site's general plan designation. The commenter then asks why the project's allowable development footprint of approximately 6 acres, allowing for area designated for native habitat preservation, would not limit the allowable number of project units to 36. The commenter then states that the EIR provides a faulty calculation that allows for 5.9 units on a "net site acreage" of 12.45 acres because the "net site acreage" would include area designated as California gnatcatcher habitat. The commenter also expresses concern that the project erroneously references a density bonus of 15 additional units on top of 74 base units for a total "allowable" development of 89 units. The commenter also expresses general concern that acreages proposed conflict with the original intent of the land use designation, including character, equestrian designations, and removal of endangered species protections.

In response to concerns regarding total allowable homes under the existing land use designation and the proposed density bonus, the comment identified an error in the density bonus calculation, which has been corrected in Chapter 3, Errata, of this Final EIR. As indicated in Chapter 3, Errata of this Final EIR, text revisions to the Draft EIR are indicated with ~~strikeout~~/<u>underline</u> in this Final EIR (refer to Chapter 3, Errata).

Specifically, Section 3.2.1.1, Residential, of the Draft EIR, p. 3-3 incorrectly indicated that base density under the state Density Bonus Law is calculated using the maximum density multiplied by the "net" acreage. In fact, the Density Bonus Law provides the density permitted for a qualifying project is

determined using "gross" rather than "net" site acreage.[2] Thus, base density is calculated by multiplying the "gross" (rather than net) site acreage of 16.78 acres by the maximum allowed density in either the zoning ordinance or land use element of the General Plan. In this case, the SFR-D designation allows a maximum up to 5.9 units per acre, which multiplied by the gross acreage of 16.78 acres results in a base density of 99.02 units, which rounds up to 100 units per Density Bonus Law (16.78 x 5.9 = 99.02).

The project proposes to provide 5% of the total units as affordable to very-low-income households, qualifying it for Density Bonus Law benefits, including a base density calculation based on gross acreage, a density bonus on top of this base calculation, an incentive/concession, and waivers of development standards under Density Bonus Law. However, the project is only seeking to utilize Density Bonus Law's base density calculation and to waive development standards that would otherwise limit or preclude project construction of the proposed 83 units with the planned amenities.[3]

As discussed in this Final EIR Errata, Chapter 3, Section 3.2.1.1, Residential, although 120 total units would be allowed under Density Bonus Law, the project proposes only 83 total units. The proposed dwelling unit distribution complies the provisions of the Density Bonus Law regarding affordable housing. The project's consistency with the City's General Plan elements goals, policies, and objectives is provided in Table 4.10-1, City of Oceanside General Plan Consistency Evaluation (provided in Draft EIR Section 4.10 and amended in Chapter 3, Errata, of this Final EIR). As outlined in Table 4.10- 1, with approval of the requested waivers, the project would not conflict with the goals, policies, and objectives, including those associated with character, equestrian designations, and biological resources of the City's General Plan (Draft EIR, p. 4.10-9); therefore, no further response to this statement is required Please refer to Response to Comment I2-8 above for a detailed discussion on land use waivers requested from the City and analyzed in the Draft EIR.

In response to concern that the net site acreage of 12.45 acres identified in the Draft EIR includes gnatcatcher habitat and

that the calculated allowable density "removes all protections for endangered species," Draft EIR Section 4.3, Biological Resources, explains that the proposed project would result in the permanent loss of 1.25 acres of habitat used by coastal California gnatcatcher. Direct impacts to habitat used by coastal California gnatcatcher habitat would be mitigated through implementation of Mitigation Measure (MM)-BIO-1, which would provide for the preservation of high-value habitat at a mitigation site (Draft EIR, p. 4.3-19) Additionally, take of habitat for coastal California gnatcatcher would need to be granted through the Section 10 consultation process with the U.S. Fish and Wildlife Service (USFWS) (MM-BIO-11) (Draft EIR, p. 4.3-19). Finally, implementation of mitigation measures (MM-BIO-2 and MM-BIO-6) would ensure that impacts to riparian habitat would be reduced to a level of less than significant (Draft EIR, p. 4.3-21). Thus, the project is not proposing removal of any endangered species protections and no further response to this statement is required.

I25-4 The commenter states that the project site includes a significant portion of habitat for environmentally sensitive species, including coastal California gnatcatcher and California coastal sage scrub and that

[2] Gov. Code, § 65915, subd. (f), (o)(6); California Department of Housing and Community Development. "482 & 484 Beck Street – Letter of Technical Assistance." December 15, 2022, page 2. Available at 482 & 484 Beck Street – Letter of Technical Assistance

[3] Under Density Bonus Law, an applicant can elect not to increase density while still benefitting from waivers and incentives (Gov. Code, § 65915 subds. (d), (e), (f)).

the northern portion of site is designated Hardline Preserve by the Oceanside Subarea Plan. In response, the potential for direct or indirect impacts to sensitive habitats and species was provided in Draft EIR Section 4.3, Biological Resources. The project would result in permanent impacts to biological resources, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis.

In regard to a portion of the site designated Hardline Preserve by the Subarea Plan, please refer to Responses to Comments I6-1 and I27-4. As discussed in Section 2.3 of the Draft EIR, the Subarea Plan has been prepared and is used as a guidance document for development projects in the City, but it has not been approved or permitted. Although the Subarea Plan is not approved, the City encourages project applicants to abide by the guiding principles of the plan when designing projects, including the avoidance of designated preserve areas. However, the Subarea Plan does acknowledge that areas of designated preserve can overlap with private ownership; therefore, the boundaries of the preserve may be revised on a project-by-project basis (Draft EIR, p. 4.3-10). The northern portion of the project site overlaps with a hardline preserve zone as defined within the Subarea Plan. However, only 0.03 acres of the proposed project would overlap with this area identified in the Subarea Plan. The project proposes to modify the current proposed preserve boundary to conform with the site design, preserving everything to the northeast of the proposed project and existing development as shown on Figure 3 in Appendix C, Biological Technical Report. The design of the project would ensure that the general location, acreage, and vegetation originally planned for preservation in the Subarea Plan would remain with implementation of the proposed project (Draft EIR, p. 4.3-23).

I25-5 The commenter states the maximum developed area should be no larger than what can be accommodated on the already disturbed area of grassland, which would be in accordance with the comments received from the USFWS. The commenter also asserts this grassland must be protected and that the proposed mitigation area at the Lake Calaveras site will not make up for the damage to the local habitat. In response, the City and applicant have not received a comment to this effect from USFWS. Refer to Response to Comment I25-4 above regarding preservation of the 6.92 acres in the northeast portion of the project site along the riparian corridor. Notwithstanding this significant preservation, as stated in Draft EIR Section 4.3, Biological Resources, MM-BIO-1 requires off-site compensatory mitigation for impacts to Diegan coastal sage scrub and non-native grassland through the creation of 6.64 acres of coastal sage scrub at the Quarry Creek mitigation site. In addition, Section 10 consultation with the USFWS would be required to ensure mitigation for identified impacts to California gnatcatcher and that coastal sage scrub habitat would meet the required mitigation ratios and reduce impacts to less than significant (see MM-BIO-11 in Draft EIR Section 4.3, Biological Resources). Agency comments are included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I25-6 The comment states that, according to the EIR, the project would add 830 daily trips along a designated open space that is not designed for that amount of traffic. . The comment states that the EIR should include chemicals produced by trips and the damage to vegetation in the park, and air quality impacts to park users.

Under CEQA, level of service (LOS) or other measures of vehicle capacity or traffic congestion (i.e., traffic delay) are no longer considered in evaluating whether a significant impact on the environment would occur; therefore, the LOS analysis referred to in the EIR and its Local Transportation Analysis (LTA) in

Appendix K has been provided for informational purposes only. As discussed in Appendix K, Draft LTA, Guajome Lake Road currently carries approximately 744 daily traffic trips and the project would generate an additional 830 daily trips. With the addition of project traffic, the total traffic volume on Guajome Lake Road would be within the Level of Service "C" capacity of 2,200 daily trips (Draft EIR Appendix K, pp. 13 and 14) and thus would meet the City's roadway safety and operation standards. As discussed in Response to Comment I24-2 above, Guajome Regional Park is discussed throughout applicable resource sections in Draft EIR Chapter 4, Environmental Analysis; also refer to Responses to Comments A2-16 and I24-2 above for further discussion. As discussed in Draft EIR Section 4.2, Air Quality, impacts to air quality from volatile organic compounds would be reduced to less-than-significant levels with the implementation of MM-AQ-1 and MM-AQ-2. As discussed in Draft EIR Section 4.8, Hazards and Hazardous Materials, impacts related to hazards and hazardous materials as a result of project implementation would be less than significant.

I25-7 The commenter suggests that the addition of project-generated traffic would endanger the existing equestrian community and that the implementation of the project would introduce residents unfamiliar with horses. As stated in Section 4.14.4 of the Draft EIR: "The project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses in the surrounding area." In other words, the project would not include equestrian trails or equestrian facilities, similar to other existing residential developments in the surrounding area. Specifically, for example, the neighborhood directly across from Guajome Regional Park via Old Ranch Road was not developed with equestrian trails or designed for horse keeping. There are no existing dedicated horse trails or crossings on Guajome Lake Road. Equestrian riders would be just as responsible as any cyclist, pedestrian, or vehicle for obeying traffic rules and crossing the road safely. The proposed project would not directly impact existing equestrian facilities in the surrounding area. Implementation of the project would not stop existing residents from being able to use the existing park for equestrian recreational activities. See Response to Comment A2-13 above in regard to pedestrians and equestrians crossing Guajome Lake Road. As required by CEQA, the Draft EIR analyzed and disclosed the potentially significant adverse environmental impacts of the project as proposed. Whether project residents may be knowledgeable about horses or familiar with equestrian communities is a social impact, not an environmental impact relevant under CEQA. Safety impacts that do not implicate the physical environment are not subject to CEQA review (*Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1204-1206 [that presence of dogs may decrease safety or enjoyment of a state beach was an "essentially social" effect unrelated to physical impacts and therefore not subject to CEQA review]; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 585). This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I25-8 The commenter suggests the project alternatives analyzed in the Draft EIR were selected by the developer and were intended to be less attractive with the objective to make money without regard to the surrounding community. The commenter asks what happened to a previous project proposed on the site for single-family/equestrian homes on large lots and objects to the requested waivers. Chapter 8, Alternatives, was prepared in accordance with CEQA Guidelines, Section 15126.6(b), as detailed in that chapter of the Draft EIR. The City is required to evaluate the project proposed, with the waivers requested under the state Density Bonus Law, not a prior proposal that was not developed. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I25-9 This comment includes conclusory remarks summarizing their general opposition throughout their letter. The commenter requests the City to review the negative impacts of the proposed project. The City Planning Commission will use the Final EIR and associated documentation in its decision to approve or deny the required discretionary permits. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

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Comment Letter I26

Robert Dmohowski

From: Lee Kelly-Gillen <lkg46@outlook.com>
Sent: Friday, January 10, 2025 3:39 PM
To: Robert Dmohowski
Subject: dEIR GUAJOME CREST PROJECT

Warning: External Source

Dear Mr. Dmohowski,
I am writing you because of the great concerns I have about the waivers that have been granted Guajome Crest Project and the continuing broken promises by the city of Oceanside. I remember clearly many years ago when Oceanside city fathers actually included planned trails from the ocean to I-15 in the General Plan and how these promises have been eroded by subsequent officials. Why bother to create general plans only to ignore them at the behest of developers? I recognize that the state has passed a Density Bonus Law which preempts all local zoning regulations, but as a charter city, why hasn't Oceanside bypassed that as Coronado and Del Mar are doing? I26-1

Two of the most important zoning requirements that are being jettisoned are the Equestrian Overlay and the Scenic Park Overlay, (which is to "conserve and protect valuable natural resources …adjacent to Guajome Regional Park" GRP) and the "protection of equestrian and rural atmosphere to achieve compatibility between equestrian and non equestrian;" both of which define this entire area. I26-2

A high density development is entirely out of character with the rural nature of the area.
The 400 plus page dEIR is quite detailed with many tables and graphs, but let's take a moment to look above that, a more wholistic look at the area. It is an area of multi acre equestrian, farming, nursery properties, contains GRP which was quite a feather in the cap of Vista, Oceanside and county planners at its creation. This development site is not just some "infill"spot but sits in the middle of a place where one can be a part of nature shared by young and old, hikers, bikers, horses and strollers. Is endangering the ambience and sense of beauty of the area worth ONLY 4 low income homes? As defined by the rep from the developers at the November 2022 neighborhood meeting stated those "LOW INCOME" homes would sell for a mere $600,000. How many of the 718 required "low income" units has the city already achieved with its aggressive developments? Perhaps these 4 could be spared to preserve this special jewel of an area. As stated in Table 4.12.1 the population growth from 2025-2035 is not expected to grow. Why not have Guajome Regional Park planning and coordinating committee address the purchase of the 16 acres and extend Guajome Park? Or at the least require the project to provide recreational, multi-use easement trail connecting GRP with trails in Jeffries Ranch. Was this committee solicited for comment as required under Sx 4-1, AESTHETICS and if so where are the minutes? I26-3, I26-4, I26-5

In light of the disastrous fires in Los Angeles and even Lahaina, Maui, common assumptions about fire protection must be challenged. Can the 233 people (questionable estimate at only 3 persons and 2 vehicles per house, even though there is parking for 4 vehicles) be evacuated safely with only one entry/exit road? The dEIR states in FPP that "fire can compromise fire protection features through unpredictable ways," and that "the movement of a fire will likely never be fully predictable," and that "several lots cannot achieve the required 100' fuel modification zone (4.2 FMZ). dEIR also states that Guajome Lake Road does not meet compliance for fire protection and casually says this development's paving a small section of the dirt road solves this, YET they are paving only a portion of the dirt road, hence problem not solved. Another looming question is can these homes acquire home/fire insurance? Many property owners in the area have had their insurance cancelled since Lilac fire. In addition dEIR states that this project "does not strictly comply with city's 5 minute response time." I26-6

I also have additional concerns about the traffic data which was taken on April 14, 2022 which was a Thursday before Good Friday, possibly skewing counts as schools and businesses might have been on vacation. There is also no I26-7

1

consideration for the safety of people with dogs, children, horses etc. who cross Guajome Lake Road at the night entrance to GRP. I26-7 Cont.

The mere fact that so many things are to be overlooked and waived in this little space of heaven in Oceanside for the net result of only 4 low income homes clearly screams of rethinking this project. I26-8

Sincerely,
Lee Kelly-Gillen

Sent from my iPad

2

Response to Comment Letter I26

Individual
Lee Kelly-Gillen
January 10, 2025

I26-1 The commenter expresses concerns about requested project waivers and asks why Oceanside, as a charter city, does not bypass Bonus Density Law similar to other cities. This commenters concern and question for the City have been noted for the record. For a detailed discussion on waivers requested and analyzed in the Draft EIR, please refer to Response to Comment I2-8 above. The law provides that the state Density Bonus Law applies to both charter and general law cities as it addresses an issue of statewide importance (Gov. Code, § 65918). Together with other state housing laws, including the Housing Accountability Act (Gov. Code, § 65589.5), the city's discretion is reduced in considering housing development. If the City does not comply with State housing laws, the consequences may include costly lawsuits, court orders compelling compliance and awarding attorney's fees, significant fines, and other orders to ensure the purposes and policies of the law are fulfilled.[4] This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I26-2 The commenter expresses concern that Equestrian Overlay and Scenic Park Overlay zoning requirements will be discarded, both of which define the area, While the project seeks waivers for Equestrian Overlay development standards, for a summary of project compatibility with the surrounding environment, please refer to Response to Comment I2-8. In summary, in order to accommodate the density allowed under Density Bonus Law, the project cannot physically comply with all of the development standards that apply to standard projects. Based on the proposed design to accommodate the project at the density permitted under Density Bonus Law and with the amenities proposed, the project seeks a waiver of some development standards, including the equestrian development standards. A summary of the development standards and required waivers are outlined in Table 3.3-1 in Draft EIR Chapter 3, Project Description, and updated in Chapter 3, Errata, of this Final EIR, to demonstrate compliance with the City's zoning designation for the project site, or where Density Bonus Law waivers are requested.

Also, refer to Response to Comment O5-5, which further discusses project consistency with the Development Regulations set forth in Section 2204 of the Zoning Ordinance for the Scenic Park Overlay District is addressed in the Draft EIR:. In other words, Scenic Park Overlay zoning requirements will not be discarded.

I26-3 The commenter expresses concern that a high-density development is out of character with the rural nature of the area, provides examples of rural uses and users in the area, and asks if the ambience and beauty of the area is worth the addition of 4 low-income homes. In response, the project would not introduce high-density housing but rather single-family homes consistent with the project site's Single-Family Detached Residential (SFD-R) General Plan land use designation and compatible with existing residential developments in the area. Five% — which is four of the total homes -- would be deed restricted for very low income, which entitles the project to benefits under Density Bonus Law. For a detailed discussion on the project's compatibility with the surrounding area, please refer to Responses

[4] Contrary to the comment, Coronado and Del Mar implement Density Bonus Law. See Chapter 86.53 of Coronado Municipal Code and Chapter 30.90 of the Del Mar Municipal Code.

to Comments I2-8 and I14-1 above. This comment does not otherwise raise a substantive issue on the content of the Draft EIR and no further response is required.

I26-4 The commenter states the low-income homes would sell for $600,000; asks the City how many of the 718 required affordable homes has the City achieved; and implies the 4 affordable homes proposed could be spared to preserve the special character of the area. This question and suggestion are noted for the record. This comment raises an economic and social issue unrelated to a physical effect on the environment. To clarify, the project would provide 4 very-low-income units, not low-income units. The City of Oceanside 2021-2029 Housing Element explains the City's Regional Housing Needs Allocation (RHNA) for this eight-year cycle is 1,268 units. Per HCD's Housing Element Implementation and APR Dashboard, the City has permitted 90 and completed zero very-low-income units during this Housing Element Cycle (reporting years 2021-2023) (HCD 2025). The prices to rent or sell such units are defined by statute. Income limits for very low-income households are generally 50 percent of area median income, adjusted for family size and revised annually. The California Department of Housing and Community Development (HCD) publishes state income limits by County and household annually.

The comment does not raise a substantive issue on the content of the Draft EIR; therefore, no further response is required.

I26-5 The commenter explains that low population growth is anticipated in the City over the next 10 years and suggests that Guajome Regional Park acquire the project site to expand the park or require the project to provide recreational trails connecting to Guajome Regional Park. The commenter also asks if the Guajome Regional Park planning and coordinating committee has been solicited for comment. Related to population growth, the comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. Refer to Response to Comment I26-5 regarding housing needs. In regard to recreational access from the project to Guajome Regional Park, please refer to Response to Comment A2-13 above. In regard to soliciting comments from the Guajome Regional Park planning and coordinating committee in regard to the EIR, the Guajome Regional Park planning and coordinating committee is no longer active; thus, no further coordination is needed. Please note that the San Diego County Department of Parks and Recreation has been solicited for comment as they were included on the City's mailing list for noticing for the proposed project. The County of San Diego provided comments on the proposed project's Draft EIR, please refer to Comment Letter A2 and the associated responses to Comment Letter A2 above.

I26-6 The commenter expresses concern regarding proposed evacuation routes for the project, references instances where the Fire Protection Plan (FPP) discusses the unpredictability of fire, and raises concern that several lots cannot achieve the required fuel modification zone (FMZ). The comment restates information contained in the Draft EIR, which does not raise an environmental issue within the meaning of CEQA. Regarding concerns related to evacuation and proposed access routes, refer to Response to Comment I4-4 above. The project would provide two access points for emergency responders along the southern boundaries of the project site along Guajome Lake Road. In regard to the unpredictability of fire, Appendix O, Fire Protection Plan Letter Report, explains that the "FPP provides requirements and recommendations for implementation of the latest fire protection features that have proven to result in reduced wildfire related risk and hazard. Even then, fire can compromise the fire protection features through various, unpredictable ways. The goal is to reduce the likelihood that the system is compromised through implementation of the elements of this FPP and a regular occurring maintenance program" (Draft EIR Appendix O, p. 45). In response to FMZ concerns, please refer to Response to

Comment I7-2 above regarding FMZ width and additional project design features that will ensure the project has a less than significant impact related to wildfire risk, as well as Response to Comment I7-4 for discussion on the requirements and procedures for onsite vegetation management.

The commenter states that, per the Draft EIR, Guajome Lake Road does not meet compliance for fire protection and the project is only paving a small section of Guajome Lake Road, The commenter also asks if the proposed homes can acquire home/fire insurance and makes reference to property owners in the area that have had fire insurance cancelled. As described in the Draft EIR Section 4.18, Wildfire, the preliminary site plans and emergency access for the project have been reviewed by the Oceanside Fire Department (OFD) and are in compliance with the applicable fire code. In regard to the unpaved segment of Guajome Lake Road located southeast of the project site, please refer to Response to Comment I2-5 above. In regard to whether homes may qualify for fire insurance, this topic is outside the purview of CEQA.

The commenter states that, per the Draft EIR, the project does not strictly comply with the City's 5-minute response time. Please refer to Response to Comment I11-2 above for discussion of response times provided in Draft EIR Section 4.13, Public Services. As discussed in Appendix O, the proposed development would be substantially consistent with OFD's 5-minute response time goal and fully compliant with the National Fire Protection Association's national guideline of having a fire response time of 6 minutes and 30 seconds, 90% of the time. To provide additional clarification on emergency response times for the proposed project, text revisions to Section 4.18, Wildfire, of the Draft EIR are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR.

I26-7 The commenter expresses general concerns about the project's traffic data because the traffic counts were obtained on the Thursday before Good Friday and schools and businesses may have been on vacation. The commenter expresses general safety concerns related to crossing Guajome Lake Road. See Response to Comment I2-5, which explains traffic congestion is not a CEQA impact. In any event, the project's Local Transportation Analysis provides the average daily trips (ADT) count that was collected along Guajome Lake Road for a period of 24 hours which includes both day and night time, on a typical school and business day in April 2022. Please refer to Response to Comment A2-13 regarding pedestrians or equestrians crossing Guajome Lake Road, which notes that the closest trail entrance to Guajome Regional Park is located approximately 0.25 miles from the southwest corner of the project site.

I26-8 The commenter ends their letter by reiterating their general opposition to the proposed project because of the requested waivers related to providing four affordable units. This comment does not raise any issues related to the adequacy of the Draft EIR. The City acknowledges the comment as a closing statement to the letter. No further response is required.

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Comment Letter I27

January 10, 2025

Robert Dmohowski, Principal Planner
City of Oceanside Planning Division
Sent via email to: rdmohowski@oceansideca.org

Subject: Comments on Guajome Lake Homes Draft Environmental Impact Report

Dear Mr. Dmohowski,

Here we are again, putting up another fight to save what's left of Oceanside so we can still enjoy living here. This is an exhausting and unsustainable way for Oceanside residents to live, constantly straining to be heard and to be valued more than developer money. The City must work harder to achieve a balance between these opposing forces. I27-1

As a wildlife biologist and Oceanside resident, I am extremely fond of Guajome Regional Park. In fact, long before I moved to Oceanside, I often drove to the park to go birdwatching, so I've been birdwatching there for about 15 years. It is a well-known North County biodiversity hotspot. That said, there must be additional analysis on project impacts to Guajome Park, both as a biological resource and as a scenic resource. I27-2 I27-3

I have been visiting Guajome Regional Park multiple times a week for the last 8+ years, so I know the birds and their patterns well, especially our two most vulnerable species: the Coastal California Gnatcatcher and the Least Bell's Vireo.

Coastal California Gnatcatcher (CAGN)

The project would involve the destruction of 1.25 acres of Diegan coastal sage scrub (CSS) on the northern edge of the site. However, this particular area was designated as "hardline preserve" in Oceanside's Subarea Plan, which is Oceanside's commitment to the Multiple Habitat Conservation Program, the regional plan to protect sensitive plant and animal species in the region. This area is critical breeding habitat for CAGN, a threatened species which is federally protected under the Endangered Species Act and designated by the state as a Species of Special Concern. In fact, the biologist who conducted the species-focused surveys for the dEIR confirmed the presence of one gnatcatcher pair that successfully nested within the Diegan coastal sage scrub on site, with three fledglings observed with the adult pair during the final two site visits. I27-4

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We must leave this occupied habitat alone. But we must take it one step further and create a corridor for the CAGN to move between this hardline CSS patch and its primary habitat within the park. If the project is implemented as is, CAGN will not be able to move between these two habitat patches as a dense row of houses will block and deter passage. Please see my proposed idea below:

I27-4 Cont.



I27-5

A corridor on the western edge of the site would allow for CAGN to move between the two habitat areas. California Department of Fish and Wildlife concurs with this idea (per a phone conservation on January 8th). A minimum width of 50 meters is recommended.

The project site is partially located in an Focused Planning Area (FPA) as designated in the Multiple Habitat Conservation Program (MHCP). For impacts to Coastal Sage Scrub, it is stated in the MHCP that "mitigation will consist of permanent conservation of habitat in an FPA. In some cases, habitat creation or restoration may also qualify as mitigation." (Final MHCP Volume 1, p 4-18). The failure of the project to include any onsite mitigation is a missed opportunity and a display of blatant disregard to the establishment of reserve areas.

I27-6

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Though offsite mitigation is included in the report, the mitigation site, Quarry Creek is a site it seems nobody has heard of, including California Department of Fish and Wildlife (per a phone conservation on January 8th). Please provide information for this mystery site. I27-7

Least Bell's Vireo (LBVI)

The northern edge of the project site is composed of riparian habitat which was determined in the dEIR to have high potential as a nesting and foraging site for the endangered Least Bell's Vireo (federally and state protected species). The southern edge of the site borders Guajome Park which has long been an important breeding site for this endangered species. I would like to know what measures will be taken to limit human disturbance to the northern riparian zone. I27-8

Throughout the dEIR it is stated that 6.92 acres of riparian habitat on the northern edge will be preserved as open space. However, in the Parks section on page 4.13-11, it states that "In addition to existing City parks and recreational facilities, as proposed by the project, residents of the project site would have private access to 6.92 acres of common open space," rendering this "high potential" habitat for an endangered species a recreational area. If this is indeed the case, and the 6.92 acres are intended for human use, the additional impacts on biological resources must be evaluated, including impacts on LBVI. I27-9

Other bird species of concern

- White-tailed Kite: White-tailed Kite, a raptor species designated fully protected in California, was observed on-site by the biologist who conducted surveys for the dEIR. The project would result in permanent impacts to over 8 acres of this species' foraging habitat. I27-10
- Yellow Warbler: This songbird species is a California Species of Special Concern. It was observed within the project site, which is not surprising as it forages and breeds in riparian habitat. I27-11
- Yellow-breasted Chat: This songbird species is also designated a California Species of Special Concern. Though it was not observed within the project site in the dEIR surveys, it is likely to occur, as it also forages and breeds in riparian habitat including nearby habitat in Guajome Park. I27-12

Wildlife movement

The dEIR overlooked the importance of the project site and its surroundings as part of the largest wildlife corridor in the area. The biologists must have been unaware that Guajome Park connects to the San Luis Rey River via a passageway that runs under highway SR-76. The statement that the site is surrounded by development that limits movement of larger animals is false. In fact, bobcats and coyotes are known to pass under the highway and sightings on both sides have been documented. I27-13

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California Department of Fish and Wildlife even wrote in their NOP response letter, dated December 8, 2022, that the area is "part of an essential wildlife corridor" and recommended "providing a thorough discussion of direct, indirect, and cumulative impacts," per Fish & Game Code § 2800 et. seq. Please have this thorough analysis completed.

I27-13 Cont.

Additional Guajome Regional Park conflicts

SCENIC PARK OVERLAY

This beautiful area has a Scenic Park zoning overlay. One of the four purposes of this Scenic Park Overlay District is to "conserve and protect valuable natural resources of recreational and scenic areas in and adjacent to Guajome regional Park and other public parks." The project will be doing the opposite of this. It will be destroying, not conserving.

I27-14

Another purpose is to "achieve a visually pleasing and compatible relationship between buildings and structures, park areas, walkways and planting areas, and the natural environment." It seems very unlikely that this dense development in the middle of an area of rural character next to a large regional park will not stick out like a sore thumb. Please provide a rendering that will demonstrate how this extraordinary feat will be achieved. Compliance with the scenic park zoning requirements, or lack thereof, must be addressed.

I27-15

Section 4.1-6 of the dEIR states "due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses." This area has quite the opposite of a "developed nature." Again, the project is next to a large beautiful natural regional park. Please have Aesthetics properly analyzed to reflect the true scenic nature of the area. It makes no sense to give it a Scenic Park designation but also claim it lacks scenic value.

I27-16

COUNTY ORDINANCES

As a County Park, Guajome Regional Park is subject to ordinances established to safeguard resources of the park. As such, I believe that the destruction and disturbance that will result from this project qualifies as mistreatment of wildlife that utilize the park and surrounding areas. Thus the project violates the County ordinance below.

I27-17

SEC. 41.112. PROTECTION OF PARK ANIMALS.
It shall be unlawful for any person without written authorization from the Parks Department to: (a) Hunt, catch, chase, trap, kill, poison, wound, injure, mistreat or attempt to hunt, catch, chase, trap, kill, wound, injure or **mistreat** any wild or domesticated animal in a County park.

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The dEIR fails to address the various impacts on Guajome Park, including impacts to sensitive species, impacts to wildlife movement through and around the park, as well as the impacts to the scenic value of the park. I27-18

Additional concerns

STORMWATER RUNOFF

I am very concerned about the two downstream waterways that will be impacted, East Channel Creek to the north and Guajome Creek to the south, both of which drain to Guajome Lake. The City must ensure these waterways do not get impacted by polluted runoff and harm the hundreds of wildlife species that depend on these water sources for survival. I would like to know how the actual impacts to the water quality of the two streams are determined and monitored. Baseline water quality testing, which is not documented in the dEIR, should be conducted so that impacts can be subsequently measured. Appendix I reports "no access," "difficult access," and "impossible access" to the actual sites, which leads one to wonder how assessments could have been made. The consultant even admits that assumptions are not field verified (Appendix I p.108). I27-19

The Conceptual Landscape Plan (Figure 3.5) states that the provided permeable surface area is 22.5% (just exceeding the 22% required by the City's Urban Forestry Program), but there is no explanation or calculation showing how this was determined. I27-20

Appendix I is quite boilerplate in nature and even includes a picture of the wrong site (43rd Street and Logan Avenue, San Diego, California). I would like to see all information, including stormwater BMPs, tailored to the unique project site. I27-21

Also, two photos on page 127 are misidentified as grassland, when it is clearly a wetland ("Grassland typical of wet areas observed, and no access to site visit.") I27-22

AIR QUALITY

Per the dEIR, the project will generate 830 average daily vehicle trips (10 trips per day x 83 dwelling units). Since hundreds of these trips will be over a dirt road (415, if we are assuming equal travel in both directions), drastically increasing the dust in the air, we need to see an analysis of the impacts of this dust on our air quality. I27-23

TRAFFIC

The estimate of traffic and the actual counts do not align. For example, on page 4.15-11 of the dEIR, it states that only 8% of the ADT (Average Daily Trips) would occur during peak morning hours (7-9am). However, in the actual traffic count conducted on April 14, 2022, **199 trips** are counted between 7am and 9am, which is 28% of the total trips counted. I27-24

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Furthermore, a single day of traffic counts does not seem sufficient. April 14, 2022 likely had below average traffic due to its proximity to the spring break of nearby schools, in particular Guajome Academy. The staggering 199 trips could be lower than average, so I would like to see further analysis including counts on various days further removed from spring break periods. I27-25

SAFETY

The increased congestion from an additional 830 daily vehicle trips will impact fire evacuation routes. It will also reduce pedestrian safety. Safety measures for pedestrians crossing Guajome Lake Road must be included. I27-26

WAIVER OF EQUESTRIAN DEVELOPMENT STANDARDS

All neighborhoods northeast of Guajome Lake Road are in a designated EQ Equestrian Overlay District. I would like to see a thorough justification for the removal of the equestrian development standards. The safety and well being of horses in the area and their owners will now be in jeopardy, with excessive dust in the air and no safe way to cross Guajome Lake Road. I27-27

LACK OF NEARBY TRANSIT

This is not the "smart growth" the City claims to promote. The closest bus stop is along North Santa Fe Avenue, which is 1.3 miles away. I27-28

CULTURAL RESOURCES

Multiple local Luiseño tribes have expressed concern about the project and resources in and around the project site. Though a consultation took place, per California Assembly Bill 52, with the Rincon Band and there San Luis Rey Band, there was no record of a consultation with the Pechanga Band or San Pasqual Band, despite the latter's request to engage in consultation. Please provide additional information if additional consultations took place. I27-29

Infill mischaracterization

In light of the location of this project, with a regional park to the south and a hardline preserve to the north, I do not think "infill" is an accurate designation. The term grossly mischaracterizes the sensitive nature of the area. Infill, according to California Public Resources Code, is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." Furthermore, this section of code pertains to Transit-oriented Infill Projects, and this project has no major transit center I27-30

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nearby, as previously mentioned. Lastly, the site lack utilities services, which will have to be added, as the area is on septic systems. Without existing infrastructure, it is not accurate to define this project as infill.

I27-30 Cont.

It doesn't take more than a drive down Guajome Lake Road or a walk through Guajome Regional Park to realize how poorly matched this project is to its surroundings. I am not opposed to building homes on the site, but there must be consideration of the surrounding communities and the adjacent regional park to ensure compatibility. The project footprint must be decreased in order for the City to adhere to its commitments to conserve sensitive biological resources in our region.

I27-31

Thank you for your time and attention.

Sincerely,
Jennifer Jacobs
Oceanside

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Response to Comment Letter I27

Individual
Jennifer Jacobs
January 10, 2025

I27-1 The commenter begins their letter expressing opposition to ongoing development in the City and its potential to diminish residents' enjoyment of living in the City. This comment does not raise any issues related to the adequacy of the Draft EIR, and no response is required.

I27-2 The commenter notes their appreciation of Guajome Regional Park especially for birdwatching. This comment does not raise any issues related to the adequacy of the Draft EIR and response is required.

I27-3 The commenter notes that Guajome Regional Park is a "biodiversity hotspot" and requests additional analysis of biological and scenic resources, specifically regarding Guajome Regional Park. The commenter also states that they know birds that use the park and their patterns well, especially the coastal California gnatcatcher and Least Bell's Vireo. Scenic resources are addressed in Draft EIR Section 4.1, Aesthetics, and biological resources are addressed in Draft EIR Section 4.3, Biological Resources. The comment does not identify any specific deficiencies or concerns in the analysis of scenic and biological resources; thus, no further response is required.

I27-4 The commenter expresses concern over the project's loss of 1.25 acres of Diegan coastal sage scrub, which is designated as a "hardline preserve" in the City's Subarea plan, and states this area is critical breeding habitat for the coastal California gnatcatcher. The commenter also notes that the species-focused gnatcatcher surveys conducted in support of the Draft EIR identified a successfully nesting gnatcatcher pair in the Diegan coastal sage scrub within the project site. As discussed in Draft EIR Sections 2.3 and 4.3.1, the Subarea Plan has not been approved or permitted but is used as a guidance document for development projects in the City. While the City encourages project applicants to abide by the guiding principles of the plan when designing projects, including the avoidance of designated preserve areas, the Subarea Plan acknowledges that boundaries of designated preserve areas may be revised on a project-by-project basis (Draft EIR, p. 4.3-10). Only 0.03 acres of the proposed project would overlap with this area identified in the Subarea Plan. Thus, the project's proposal to modify the current proposed preserve boundary to conform with the site design is consistent with the Subarea Plan. The project proposes to preserve everything north of the proposed development footprint and limits of grading as shown on Figure 3 in Appendix C, Biological Technical Report. The design of the project would ensure that the general location, acreage, and vegetation originally planned for preservation in the Subarea Plan would remain with implementation of the proposed project. As discussed in Response to Comment A3-14, since the Subarea Plan has not been adopted or permitted, take of habitat for coastal California gnatcatcher (i.e., coastal sage scrub) will need to be granted through the Section 10 consultation process with the USFWS (Mitigation Measure [MM]-BIO-11). The Draft EIR adequately addressed the potentially significant direct and indirect biological resource impacts of the project in Section 4.3 and the Biological Technical Report (Appendix C) and demonstrates that project impacts would be less than significant with mitigation.

I27-5 The commenter states that the Diegan coastal sage scrub habitat needs to be left undisturbed and the project should create a corridor to allow the gnatcatcher to move between the onsite coastal sage scrub and Guajome Regional Park. The commenter provides an image depicting their suggested wildlife

movement corridor along the project site's western boundary, states that the California Department of Fish and Wildlife concurs with their proposed corridor idea (per a phone conservation on January 8), and states that a minimum width of 50 meters is recommended. Please refer to Response to Comment A3-15 above regarding the project's preservation of the riparian habitat onsite and effects on wildlife movement. In particular, Response to Comment A3-15 explains that the project site is located outside of the Wildlife Corridor Planning Zone designated by the Subarea Plan and finds that the project would not result in the loss of wildlife corridors or habitat linkages (Draft EIR, p. 4.3-21). While the Diegan coastal sage scrub habitat on-site provides important habitat for the coastal California gnatcatcher, the non-native grassland in the southern portion of the site "is mowed annually, and the overall height of the grasses, forbs, and scattered shrubs are likely too short to provide adequate habitat for foraging opportunities. The lack of suitable vegetation may deter the gnatcatchers from using this area during foraging and/or dispersal" (Draft EIR, p. 4.3-8). The comment is correct that the direct overland connection between onsite habitat and Guajome Regional Park would be lost by development of the project, but the riparian corridor in the northern portion of the project site continues to the northwest and provide a link to the park on the southerly side of State Route (SR)-76, as shown in Figure 3-6 of the Subarea Plan (City of Oceanside 2010). That figure also shows that the proposed project is located outside of the wildlife corridor planning zone, the regional corridor and local gnatcatcher corridor. The coastal sage scrub onsite currently serves as live-in habitat and a steppingstone for dispersal of local populations of gnatcatcher. For informational purposes only, please note that the coastal California gnatcatcher is a bird that would be able to fly without the direct overland connection between onsite habitat and Guajome Regional Park. The riparian corridor within the project site has been identified as hardline preserve within the project site and will not be impacted by the project thus allowing for gnatcatchers in the vicinity to utilize the riparian corridor to move from the coastal sage scrub onsite to other suitable habitat in the region, including Guajome Regional Park. Thus, providing a north-south wildlife movement corridor within the project site is not necessary to ensure movement of gnatcatchers between the onsite Diegan coastal sage scrub and habitat within the park. As a project design feature, the onsite riparian area would be managed by the Home Owners Association to prevent trespassing into natural habitats and ensure the area remains free of trash. This preservation of the riparian habitat ensures that important wildlife corridors and habitat linkages are maintained, providing continuity for species that rely on these habitats for migration, foraging, and nesting.

I27-6 The commenter states that the project site is partially located in a Focused Planning Area (FPA), as designated in the Multiple Habitat Conservation Plan (MHCP) and expresses concern that the project does not include onsite mitigation. The MHCP recognizes that permanent conservation of coastal sage scrub in an FPA is necessary to mitigate for loss of this habitat and in some cases habitat restoration or creation may also qualify as mitigation. However, the MHCP does not require onsite mitigation. Draft EIR Section 4.3, Biological Resources, finds that with implementation of the mitigation measures identified in Section 4.3, the project would be consistent with the MHCP and Subarea Plan.

I27-7 The commenter states that the off-site mitigation site, Quarry Creek, is not a known location to the commenter or the California Department of Fish and Wildlife (per a phone conservation on January 8) and requests additional information on this site. Please refer to Responses to Comments A3-9, A3-12, and A3-23 which state that off-site mitigation at the Quarry Creek mitigation site has been identified in negotiations with the U.S. Fish and Wildlife Service (USFWS) as their preferred mitigation, and that the Quarry Creek mitigation site is a preserve currently managed by San Diego Habitat Conservancy.

I27-8 The commenter requests to know what measures will be taken to limit human disturbance to the northern riparian zone, which the Draft EIR acknowledges has high potential to support nesting and foraging by the endangered Least Bell's Vireo. Although fencing is discussed on Draft EIR page 4.3-21 in Section 4.3, to ensure that the fencing is described adequately in the EIR, Section 3.2.5, Project Design Features, has been revised to a specific fencing project design feature. Revisions to Draft EIR Chapter 3, Project Description, and Section 4.3, Biological Resources, are shown as ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. Further, Draft EIR Section 4.3 identifies mitigation measures proposed for management and monitoring of sensitive habitat and to ensure the project complies with the avoidance/minimization provisions and monitoring program as required by USFWS.

I27-9 The commenter identifies an error related to the amount of common open space on page 4.13-11 of the Draft EIR. The 6.92 acres of habitat area to the northeast of the development area is not proposed for private recreation. See Response to Comment I27-8 above. This error in Section 4.13 has been corrected and text revisions are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR to clarify this information. These minor revisions would not change any impact determinations of the Draft EIR regarding the project's less than significant impacts and do not raise new or additional environmental issues concerning the adequacy of the Draft EIR.

I27-10 The commenter identifies white-tailed kite as another bird species of concern, notes that the Biological Technical Report prepared in support of the EIR states it was observed onsite, and notes that the project would result in permanent impacts to over 8 acres of white-tailed kite foraging habitat. Draft EIR Section 4.3 addresses this species and identifies mitigation measures to reduce impacts to special-status wildlife species to less than significant (Draft EIR, p. 4.3-19). This includes mitigation measures to be implemented during construction to minimize impacts to bird species and MM-BIO-1 which requires offsite mitigation for the loss of foraging habitat. This comment does not identify any inadequacies with the analysis and mitigation measures and no further response is required.

I27-11 The commenter identifies yellow warbler as another bird species of concern and notes that the Biological Technical Report prepared in support of the EIR states yellow warbler was observed onsite. Appendix D-1 to Appendix C, Cultural Resources Inventory Report, notes that yellow warbler has a potential to nest in the onsite riparian habitat and a potential to forage over the entire site. The riparian habitat will be preserved onsite, thus no direct impacts to nesting yellow warbler would occur. Draft EIR Section 4.3 identifies mitigation measures to be implemented during construction to minimize impacts to bird species and MM-BIO-1 requires offsite mitigation for the loss of foraging habitat. This comment does not identify any inadequacies with the analysis of impacts to special status wildlife and associated mitigation measures and no further response is required.

I27-12 The commenter identifies yellow-breasted chat as another bird species of concern that has potential to nest and forage in the onsite riparian habitat although it was not observed onsite. The riparian habitat will be preserved onsite, thus no direct impacts to nesting yellow-breasted chat would occur. Draft EIR Section 4.3 identifies mitigation measures to be implemented during construction to minimize impacts to bird species and MM-BIO-1 requires offsite mitigation for the loss of foraging habitat. This comment does not identify any inadequacies with the analysis of impacts to special status wildlife and associated mitigation measures and no further response is required.

I27-13 The commenter states that the Draft EIR overlooked the importance of the project site as a component in the largest wildlife corridor in the area, noting that movement from San Luis Rey River to Guajome

Regional Park occurs via a passageway that runs under SR-76. The comment also states that the statement in the Draft EIR that "the site is surrounded by development that limits movement of larger animals is false" and then notes that bobcats and coyotes are known to pass under the highway. The comment also references the California Department of Fish and Wildlife Notice of Preparation (NOP) response letter which identifies the area as an essential wildlife corridor. In response, the Draft EIR statement referenced in this comment is specific to the project site; it does not have any relation to wildlife passing under SR-76 and into Guajome Regional Park. Further, development of the project would have no effect on wildlife usage of the passageway under SR-76. The project would preserve the riparian habitat and an adjacent upland buffer area, which would maintain the wildlife movement function of the project site and the site's contribution to the wildlife corridor addressed in this comment. The riparian corridor in the northern portion of the project site continues to the northwest and provide a link to the park on the southerly side of SR-76, as shown in Figure 3-6 of the Subarea Plan (City of Oceanside 2010). That figure also shows that the proposed project is located outside of the wildlife corridor planning zone, the regional corridor and local gnatcatcher corridor. Please refer to Responses to Comments A3-15 through A3-17 above for responses related to potential impacts on local wildlife movement.

I27-14 The commenter states that one of the four purposes of the Scenic Park Overlay District is to conserve and protect natural resources of recreational and scenic areas in and adjacent to Guajome Regional Park and provides their opinion that project would do the opposite of this. The commenter does not provide any further detail on the specific project-related impacts to the adjacent Guajome Regional Park. As discussed in Draft EIR Chapter 3, Project Description, the project is consistent with the General Plan and zoning designations for the project site. The Draft EIR demonstrates that the proposed project would be consistent with the City's General Plan for how this property should be used and does not conflict with the City's Zoning Ordinance. Draft EIR Sections 4.1, Aesthetics, 4.3, Biological Resources, and 4.10, Land Use and Planning, evaluate the project's potential impacts related to scenic and natural resources and consistency with the purposes of the Scenic Park Overlay District.

I27-15 The commenter states that the project seems unlikely to achieve "a visually pleasing and compatible relationship between buildings and structures, park areas, walkways and planting areas, and the natural environment," which is another purpose of the Scenic Park Overlay District. The commenter requests a rendering of the proposed project and states that the Draft EIR must address compliance, or lack thereof, with the scenic park zoning requirements. Please refer to Response to Comment O5-5 below, which describes the project consistency with the Development Regulations set forth in Section 2204 of the Zoning Ordinance for the Scenic Park Overlay District. The narrative and graphics provided within the project description, as well as the analysis provided in Section 4.1, Aesthetics, support the Draft EIR's good faith effort at full disclosure of the project's potentially significant impacts under CEQA. The level of detail provided complies with the CEQA Guidelines and provide sufficient detail to evaluate environmental impacts. The Draft EIR analysis is based on the conceptual site and landscaping plans. If the project is approved, the City will conduct further review of the project's development plans for compliance with the applicable design criteria and requirements of the City's Zoning Ordinance.

I27-16 The commenter states that the Draft EIR characterization of the project vicinity as having a "developed nature" that lacks scenic viewpoints or scenic vistas is incorrect because the project site is "next to a large beautiful natural regional park." The comment states that the aesthetics analysis should reflect

the scenic nature of the area given the Scenic Park designation. Draft EIR Section 4.1, Aesthetics, property identifies scenic vistas that have been identified in the City's General Plan, including Guajome Regional Park. The General Plan identifies views of the park as the scenic vista in the area (Draft EIR, p. 4.1-2), but views from within the park towards the surrounding properties are not considered scenic vistas and the project site is not identified on General Plan Table ERM-2 as a visual open space (Draft EIR, p. 4.1-6). Development of the project site would not diminish or preclude views of the park from publicly accessible viewpoints and thus would not adversely affect scenic vistas that have been identified by the City. Residential development surrounds much of Guajome Regional Park, thus additional residential development around the park would not substantially change the aesthetic values of the park.

I27-17 The commenter references San Diego County Code Section 41.112, an ordinance related to protection of park animals and states that the loss of habitat from development of the project "qualifies as mistreatment of wildlife that utilize the park and surrounding areas." The quoted ordinance prohibits activities that would have a direct physical effect on individual animals, such as hunting, catching, chasing and wounding, in addition to mistreating. From this, it can be inferred that the inclusion of the word "mistreat" in the list of prohibited actions should be interpreted using the common definition of mistreat, which is to treat badly or abuse, or to treat (a person or animal) badly, cruelly, or unfairly. These definitions do not extend to the type of indirect effects suggested in this comment. Further, Draft EIR Section 4.3, Biological Resources, evaluates potential indirect impacts including long-term indirect impacts associated with the proximity of a development to natural areas and provides minimization and mitigation measures to reduce potential significant impacts to less than significant. The project would not directly result in mistreatment of animals that are present within Guajome Regional Park or surrounding areas and thus would not violate San Diego County Code Section 41.112.

I27-18 The commenter states additional analysis is needed regarding impacts on Guajome Regional Park, specifically impacts to sensitive species, wildlife movement, and the scenic value of the park. Please refer to Responses to Comments I27-5 and I27-10 through I27-16 above for discussion of the Draft EIR's consideration of these impacts.

I27-19 The commenter expresses concern over the project's potential impacts to two downstream waterways, East Channel Creek to the north and Guajome Creek to the south which both drain to Guajome Lake and asserts that baseline water quality testing must be done for those waterways. Please refer to Draft EIR Section 4.9.1, which describes existing conditions related to surface water quality, including Table 4.9-1, Downstream Water Quality Impairments, and an analysis of impacts related to hydrology and water quality. Compliance with the General Construction Permit, Storm Water Quality Management Plan (SWQMP), stormwater pollution prevention plan (SWPPP), and best management practices (BMPs) would ensure construction-related impacts to water quality would be less than significant. Implementation of the SWQMP, associated source control measures of the Preliminary Hydrology Report, and BMPs would ensure that potential water quality impacts during project operation would be less than significant. The project design includes two biofiltration basins that would provide stormwater treatment for project site runoff before it leaves the site. Additional onsite measures include "prevention of illicit discharges, storm drain signage, on-site storm drain inlets, future indoor and structural pest control, and landscape/ outdoor pesticide use" (Draft EIR, pp. 4.9-8 and 4.9-9). As required by the SWQMP and the Regional MS4 Permit, the project would be required to provide for implementation and ongoing maintenance of these features and provide documentation of annual

maintenance verification to the City. Overall, the project would comply with the San Luis Rey Watershed WQIP and would not conflict with or obstruct implementation of a water quality control plan. Water quality testing of the downstream waterways is not necessary because the SWQMP (Appendix I) uses methodology established in the County of San Diego BMP Design Manual, including a threshold analysis for the receiving streams, to determine that the project would not yield significant levels of sediment to the downstream waterways and thus "will not impact negatively the receiving stream (Guajome and East Channel Creeks) and downstream Guajome Lake" (Draft EIR Appendix I Attachment 2b, p. 1).

I27-20 The commenter states that there is no calculation or explanation as to how the permeable surface area was determined in Figure 3-5. The percentage of permeable surface is determined by taking the number of square feet that are expected to remain permeable and the total number of square feet within the project site area, minus open space areas and right-of-way. As discussed in Draft EIR Chapter 3, Section 3.2.1.3, the proposed project would be required to comply with Article 3049, Urban Forestry Program, of the City's Zoning Ordinance. The Urban Forestry Program requires new development over 1 acre in size to provide a minimum permeable surface area of 22%. As indicated in Draft EIR Table 3.3-1 (Draft EIR Table 3.3-1 updates are provided in Chapter 3, Errata, of this Final EIR), the project would exceed this requirement. In addition, the City would be required to conduct further, more detailed, review of the development plans prior to issuance of grading and building permits to verify compliance with the Urban Foresty Program requirements. Please note that Draft EIR Figure 3-5, Conceptual Landscape Plan, has been revised to include an updated landscape plan that also exceeds the Urban Foresty Program requirements. The updated landscape plan is shown as Figure 3-5a and 3-5b in Attachment A of this Final EIR and referenced in Chapter 3, Errata, of this Final EIR.

I27-21 The commenter states that Appendix I is boilerplate and includes an image of the wrong project site. The commenter requests that all information on stormwater BMPs be tailored to the project site. Please refer to the Proposed Hydrology Exhibit in Appendix H, Preliminary Hydrology Study. The SWQMP (Appendix I) was prepared by experts based on requirements set forth in the Regional Water Quality Control Board's National Pollutant Discharge Elimination System MS4 Permit that covers the San Diego Region, using the template that was developed for and adopted by the City, and the SWQMP was accepted by City staff as compliant with the same. The image of a site that is not the project site mentioned in this comment is from the County's stormwater manual BMP Design Fact Sheets, Section E.12 BF-1 Biofiltration. The analysis in Appendix I, Appendix H, and Draft EIR Section 4.9 is all specific to the project site. Two biofiltration basins are proposed on the project site to provide stormwater treatment for the pollutants discharged from the development. The project is required to maintain structural stormwater BMPs in accordance with the SWQMP Operations and Maintenance Plan and to provide documentation of annual maintenance verification to the City as required by the Regional MS4 Permit. Potential project impacts related to water quality standards or waste discharge would be less than significant.

I27-22 The commenter states that Appendix I misidentifies photos of wetland as "grassland typical of wet areas." In response, the SWQMP (Appendix I) was prepared by experts based on requirements set forth in the Regional Water Quality Control Board's National Pollutant Discharge Elimination System MS4 Permit that covers the San Diego Region and was accepted by City staff as compliant with the same. The terminology used in Appendix I is specific to consideration of stormwater quality management and not specific to consideration of impacts to biological resources. Project development

has been sited to ensure all direct impacts to wetlands/riparian areas are eliminated. Potential project impacts related to water quality standards or waste discharge would be less than significant. This comment does not otherwise raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

I27-23 The commenter states that the Draft EIR should include an analysis of impacts of dust from project-generated trips on Guajome Lake Road. The project would pave the segment of Guajome Lake Road from Albright Street to the western project site boundary. Thus, it would reduce dust emissions from existing vehicles traveling on this segment of Guajome Lake Road. Please refer to Response to Comment I2-5, which discusses the additional air quality modeling conducted to account for this dust. The modeling demonstrated that project's effects associated with fugitive dust related to the travel on unpaved roads do not result in adverse significant effects.

I27-24 The commenter states that the actual traffic counts and average daily trips do not align and compares the estimated percentage of project-generated trips that would occur in the AM Peak hour with the percentage of existing trips that occur in the AM Peak hour. The daily and peak hour project-generated trips were calculated based on trip generation rates for single-family residences established in the San Diego Association of Governments (SANDAG) Guide of Vehicular Traffic Generation Rates (Draft EIR, p. 4.15-11), which is the industry-standard source for determining the likely amount of traffic generated by a project. The daily traffic volume on a roadway is based on its functional classification and the locations/destinations it connects, thus the proportion of AM Peak hour volumes relative to the daily volume on a given roadway can vary from the proportion of AM Peak hour volumes relative to the daily volume generated by an individual project.

I27-25 The commenter suggests that the traffic counts may be lower than typical because they were taken on a day that was proximate to the spring break of nearby schools. The traffic count was taken on a Thursday when local schools were in session, consistent with industry-standard practices. The proximity of the traffic count day to the local charter school's spring break is not expected to have resulted in substantially lower traffic volumes than would have been recorded on a different day.

I27-26 The commenter states the increased congestion from 830 vehicle trips will impact fire evacuation routes and reduce pedestrian safety. Refer to Response to Comment I4-4 regarding fire evacuation and Response to Comment A2-13 regarding pedestrian safety.

I27-27 The commenter requests justification for the removal of equestrian development standards. The commenter expresses concern with the safety and wellbeing of horses in the area and believes horses and their owners will be in jeopardy due to excessive dust and no safe way to cross Guajome Lake Road. Please refer to Response to Comment I2-8 above providing clarification on the proposed waivers from the Equestrian Overlay standards; refer to Response to Comment I2-5 above regarding dust emissions; and refer to Response to Comment A2-13 above in regard to safety concerns for crossing Guajome Lake Road.

I27-28 The commenter notes there are no bus stops nearby and states the project is not "smart growth." Please refer to Response to Comment I4-3 regarding smart growth considerations. The EIR does not assert that the project represents smart growth. The project is consistent with the General Plan and zoning designations for the project site. The City can promote smart growth while also adhering to its General Plan in areas where opportunities for smart growth are limited. The comment does not contain

any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. No further response is required.

I27-29 The commenter states that tribal consultation was conducted with two local tribes (the Rincon Band and the San Luis Rey Band) but no record of Assembly Bill (AB) 52 consultation with two other local tribes (Pechanga Band or San Pasqual Band) is provided, despite San Pasqual Band having requested consultation. The commenter requests clarification on whether additional consultations took place.

Please refer to the discussion of the AB 52 outreach and consultation conducted by the City and of the general informational outreach conducted by the EIR preparer in Draft EIR Section 4.16 (Draft EIR, pp. 4.16-9 and 4.16-10). In compliance with AB 52, the City provided formal notification of the project on September 28, 2022, to California Native American tribal representatives identified by the California Native American Heritage Commission. Neither the San Pasqual Band nor the Pechanga Band responded to the City's formal AB 52 notification letters in September 2022; they only responded to the general outreach letters sent by the EIR preparer in April 2022 and none of the responses to the April 2022 outreach letters (provided in Appendix D) requested consultation. Section 4.4, Cultural Resources, of the Draft EIR has been revised to clarify that no other requests for consultation were received from Native American Tribal Representatives other than the Rincon Band and San Luis Rey Band (Draft EIR, p. 4.4-9) following City's formal notification, as shown in Chapter 3, Errata, of the Final EIR. Draft EIR Section 4.4, Cultural Resources, and Section 4.16, Tribal Cultural Resources, summarize the notifications sent by the EIR preparer and consultations carried out by the City. The agreed upon mitigation measures are included in the Draft EIR (Draft EIR, pp. 4.4-13 through 4.4-15 and referenced on Draft EIR p. 4.16-11). Please also note that the tribes have been solicited for comment on the Draft EIR as they were included on the City's mailing list for noticing for the proposed project and, currently, no tribal representatives have provided comments since the start of the public review period for the Draft EIR. Draft EIR Section 4.16 includes the CEQA required analysis and disclosure of the project's potential to have significant tribal cultural resource impacts.

I27-30 The commenter asserts that the project site is not an "in-fill site" because the site supports a hardline preserve area, there is a regional park to the south, the site does not have utility services, and the Public Resources Code definition quoted in the comment pertains to transit-oriented projects but there is no major transit center nearby. In response, The Governor's Office of Land Use and Climate Innovation describes the term "infill development" as referring to building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas. Infill development is critical to accommodating growth and redesigning our cities to be environmentally- and socially-sustainable. The project is considered to meet this description, as well as the common definition of "infill development," because the properties adjacent to the western, northern, and eastern property boundaries are developed with residential uses and Guajome Lake Road is adjacent to the site's southern boundary and because it proposes to place housing on underutilized land that has previously been developed in an urbanized area. The Draft EIR does not rely on any of the streamlining provisions or exemptions that CEQA affords to infill sites and does not identify the project as transit-oriented. It provides a robust analysis of the project's potential environmental effects and uses the term infill only to characterize that adjacent properties are developed rather than in the context of the formal Public Resources Code definition quoted in this comment. Additionally, the proposed project would be served by extending the existing public utilities that serve adjacent existing

development. Please refer to Section 4.17, Utilities and Service Systems, for information on the existing utilities and service system conditions of the project site.

I27-31 The commenter ends their letter by summarizing their general opposition to the project because of concerns about the project's compatibility with the surrounding land uses, including Guajome Regional Park. The comment states that the project footprint must be reduced to meet the City's commitments to conserve sensitive biological resources. Refer to Response to Comment A3-9 regarding the Reduced Development Footprint Alternative evaluated in the Draft EIR, which notes that while the Reduced Development Footprint Alternative would reduce certain impacts to biological resources compared to the project, project impacts to biological resources would be similarly reduced to less than significant with mitigation incorporated, such that the alternative would result in similar less than significant impacts to biological resources as compared to the project with mitigation incorporated. The City acknowledges the comment as a closing statement to the letter. No further response is required.

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Comment Letter I28

From: Tawny Oland <TAWNYRIELLY@gmail.com>
Date: January 10, 2025 at 11:59:29 AM PST
To: rdmohowski@oceanside.org, rdmohowski@oceanside.org, guardguajome@yahoo.com
Subject: Opposition to Guajome project

Dear Mr. Dmohowski,

I reside at 5430 Albright Street. I have lived here my whole life; I am 36 years old. I lost my husband 3 years ago tragically - so its just my son and I right now. I28-1

I am hoping to raise my son in a great area, great schools- that I had as a child growing up. This area has been rural my entire life. People trailer in their horses, people camp at the park, jog, bird watch etc. I would like this to continue.

The project is too dense and very disruptive of the current environment, would have a great impact with the cars alone. The two blind corners on Guajome Lake Road are very dangerous right now with all the traffic as from both high schools and residents using for work. Twice a day this road is a major freeway and not safe. The thought of 83 more homes with probably two cars each is a nightmare and accidents waiting to happen. I28-2

I want to express my concerns and let you know I do not agree with this project. I feel the city needs to take another look at this project and ensure current residents that privacy, safety and density issues will be reviewed and addressed. I feel more meetings need to occur. I completely oppose this project. I28-3

Also, the residents of Albright Street are in the process of signing the petition for NO PARKING - as the criminal activity continues and for the safety of residents who require emergency services. Due to one home, most of us can't even get out of our driveways. Because parking is allowed - police will not assist. My father had a heart issue, and my mother couldn't even get out of their driveway!! Please do not abandon the residents of Albright Street and really take an interest in our concerns. I28-4

Tawny Oland
5430 Albright Street

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Response to Comment Letter I28

Individual
Tawny Oland
January 10, 2025

I28-1 The commenter begins their letter explaining that they are a long-time community member in the area. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I28-2 The commenter expresses concern that the project is too dense and makes reference to two blind corners on Guajome Lake Road; and explains that there is already too much traffic on Guajome Lake Road. In regard to project traffic and road safety concerns with project implementation, please refer to Responses to Comments I1-2 and I1-3 above. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required.

I28-3 The commenter expresses opposition to the project and asks the City to consider additional review of the project before approval to ensure that privacy, safety, and density issues are reviewed and addressed. In regard to road safety concerns with project implementation, please refer to Response to Comment I1-3 above. In regard to privacy concerns, CEQA requires consideration of publicly accessible viewpoints, such as views from Guajome Lake Road, and does not require consideration of private views. In regard to project density concerns, please refer to Response to Comment I2-8 above. This comment does not raise any issues related to the adequacy of the Draft EIR, and no further response is required. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

I28-4 The commenter asserts the residents of Albright Street are in process of signing a petition related to parking to address existing criminal activity and emergency response concerns. This comment does not make reference to the proposed project and does not raise any issues related to the adequacy of the Draft EIR. No response is required.

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Comment Letter 01

San Diego County Archaeological Society, Inc.

Environmental Review Committee

January 4, 2025

To: Mr. Rob Dmohowski, AICP, Principal Planner
Planning Division
City of Oceanside
300 North Coast Highway
Oceanside, California 92054

Subject: Draft Environmental Impact Report
Guajome Lake Road Subdivision Project
T22-00004, D22-00009, DB22-00005

Dear Mr. Dmohowski:

I have reviewed the cultural resources aspects of the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information provided on the City's website, we note the same two issues cited in our letters on several other recent projects: 01-1

1. The mitigation measures included in the DEIR and its Appendix D address appropriately the process to be followed for any Tribal cultural resources encountered but are silent on the treatment of non-Tribal material. We note that the County's Department of Planning and Development Services has recognized this situation and developed one approach to resolving the problem. 01-2

2. Section 3.2 of Appendix D to the DEIR cites a series of aerial photos, the earliest being from 1938. Apparently the 1928 aerial photos ("Tax Factor" photo series) shot for the County Assessor were not inspected. As the 1938 photo is said to show the project area as undeveloped, the failure to check the 1928 photos is probably of no consequence, but checking them should be normal practice. 01-3

SDCAS appreciates the opportunity to participate in the City's environmental review process. 01-4

Sincerely,

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

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

cc: Dudek
SDCAS President
File

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

Response to Comment Letter O1

Organization
San Diego County Archeological Society, Inc.
January 4, 2025

O1-1 The comment is an introduction to their letter, on behalf of the San Diego County Archeological Society, Inc. The City acknowledges the comment as an introduction to comments that follow. No further response is required or necessary.

O1-2 The commenter states that the mitigation measures included in the Draft EIR and Appendix D, Cultural Resources Inventory Report, are silent on the treatment of non-tribal material and notes the County of San Diego's Department of Planning and Development Services has recognized this problem and has developed an approach to the problem. Please refer to Draft EIR Section 4.4, Cultural Resources; the language included in MM CUL-6 states that the Qualified Archaeologist or the Luiseño Native American monitor may halt ground disturbing activities if unknown tribal cultural resources, archaeological artifact deposits or cultural features are discovered, and then defines the treatment of resources which includes the determination of potential importance, avoidance and protection is the preferable mitigation, and if avoidance is not feasible, a data recovery plan shall be prepared. Non-Tribal resources are included in Mitigation Measure (MM)-CUL-6 under archaeological deposits or cultural features; however, the language in MM-CUL-6 has been revised to clarify what are qualifying non-Tribal resources, and to include the curation of qualifying non-Tribal unique archeological resources (artifact deposits or cultural features or artifacts). Changes have been made in ~~strikeout~~/ underline in Chapter 3, Errata, of the Final EIR.

O1-3 The commenter raises a concern that the 1928 aerial photos ("Tax Factor" photo series) were not reviewed and only the 1938 photo is noted in the Draft EIR as the earliest aerial photo.

Appendix D, Cultural Resources Inventory Report, contains a section on Dudek's review of historic maps and aerials, including a review of historic aerial photographs from 1938, and historic topographic maps from 1893. The inclusion of any photographs prior to 1938 would not change the analysis and are only referenced to understand the history of development on the site. Review of the 1928 "Tax Factor" aerial photographs referenced would not have the potential to reveal new relevant information or previously unrecorded resources not already known through review of the aerial photographs, topographic maps, and records from the South Coastal Information Center, as a review of the aerial photographs and topographic maps (the earliest map available is 1893, which is earlier than the 1928 "Tax Factor" aerial photo series) reveal that no historic structures are located within the Parcel Area. Through this research, the Cultural Resources Inventory Report and its review of historic aerial photographs/topographic maps are considered sufficiently adequate for the purposes of identifying the project's potential historic resources impacts, and a review of the 1928 "Tax Factor" aerial photo series or revisions to the Cultural Resources Inventory Report (Appendix D) and the Draft EIR are not warranted.

O1-4 This comment expresses appreciation to participate in the City's environmental review process. The City acknowledges the comment as a closing statement to the letter. No further response is required or necessary.

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Comment Letter 02

Preserve Calavera
Coastal North San Diego County

January 9, 2025
Robert Dmohowski, Principal Planner
City of Oceanside Planning Division
Sent via email to rdmohowski@oceansideca.org

Subject: Comments on Guajome Lake Homes DEIR

Dear Mr. Dmohowski,

This project is one of the worst examples of how the density bonus law is being used to destroy neighborhood character, ignore impacts on adjacent land uses—in this case a regional park, and ignore numerous environmental impacts . Furthermore, the density bonus law has been incorrectly interpreted to allow waivers that are not allowed. The project has substantial adverse impacts that have not been properly analyzed or mitigated. The key areas of concern include compatibility with the adjacent neighborhood, regional park, sensitive habitat, GHG, traffic, and housing. We realize that the density bonus law gives our city limited discretion about approving this project. But you still have the ability, and responsibility, to ensure that the project complies with density bonus law, environmental issues are addressed and that we end up with a project that will benefit our community, not harm it.

02-1

02-2

We believe the identified "environmentally superior" project is far better than the project that was proposed. Yet even that one has significant adverse impacts that have not been addressed, and still has essentially the same issues with compatibility with the neighborhood and adjacent park.

02-3

The following are specific comments on the DEIR for this project submitted on behalf of Preserve Calavera:

02-4

Project Description

- **Project fails to meet all of the stated objectives**
  Section 3.1 identifies 5 project objectives. The project fails to meet 4 of those 5 stated objectives. The issues with these objectives include:

  1. It does not achieve "functional compatibility" with other nearby land uses. This project is in the middle of an equestrian zone, an area with large lots and many that accommodate horses. It specifically is waiving compliance with the Equestrian Overlay Zone, will not accommodate horses or even provide equestrian access to Guajome Lake Rd that will become more difficult for safe equestrian crossing. It includes single family housing on small lots at a density of about 9/buildable acre whereas the nearby properties along Guajome Lake Rd have a single home on multiple acres. The proposed density is not at all consistent with the nearby properties. Furthermore, it will cause extensive impacts to the adjacent Guajome Regional Park.

02-5

5020 Nighthawk Way – Oceanside, CA 92056
www.preservecalavera.org
Nonprofit 501(c)3 ID#33-0955504

2. This is not an in-fill site; infill sites have existing utilities. This site requires improvements to road and sewer extension as the area is currently on septic systems.
3. With only 4 affordable units provided it cannot claim to be "maximizing" affordable housing opportunities. Numerous other projects have built the minimum 10% on site affordable housing that was the standard when this application was filed. Furthermore, it is not a site "currently served by existing utilities, services, transit and street access." The project requires a 2,000 ' extension of the sewer line, there are no nearby services, and the closest transit stop is 1.3 miles. This location does not provide transportation options, is currently a high VMT area and that will only be exacerbated with this project.
4. The project is not consistent with two key elements of the Zoning Ordinance-: the Special Park Overlay District, and the Equestrian Overlay District. Both of these districts are part of the Zoning Ordinance and provide more specific requirements for the geographic area that includes the project site.

02-6

02-7

02-8

➢ **The concept landscaping plan does not adequately optimize the use of natives, restrict the use of invasives or assure permanent compliance with requirements for 12% tree canopy cover or OFD restrictions on plantings within 0-5" of building foundations**.
The project area's southwestern-facing boundary at Guajome Lake Rd is immediately adjacent to County of San Diego Guajome Regional Park. This part of the regional park has healthy Coastal Sage Scrub (CSS) plants including California Sagebrush (*Artemisia californica*), California Buckwheat (*Eriogonum fasciculatum*), Menzies' Goldenbush (*Isocoma menziesii*), Coyote Bush (*Baccharis pilularis*) transitioning into a riparian zone with larger plants including Toyon (*Heteromeles arbutifolia*), California Wildrose (*Rosa californica*), Mule Fat (*Baccharis salicifolia*), Red Willow (*Salix laevigata*), and Coast Live Oak (*Quercus agrifolia*). On the northeastern-facing boundary, there is a slope with more California Sagebrush (*Artemisia californica*) transitioning as it drops in elevation to another riparian zone that includes Western Sycamore (*Platanus racemosa*). Most native trees in the CSS habitat are dwarf trees/large shrubs due to low water but transition to taller trees once water is present such as in riparian zones. Therefore, the use of taller trees like Western Sycamore within the project site would require frequent irrigation to ensure tree health. Dwarf trees/large shrubs would require less irrigation and could go without irrigation once established, which typically is around 2 years.

The project landscaping palette includes some recommended plants that are native to the project site, plants that are native to California but not native to the project site, non-native ornamental species, and one species that is on the emerging invasive plants watch list.

02-9

Specific comments on Plant Palette

1. Western Redbud (*Cercis occidentalis*) is a California native plant, but it is native to montane regions and not the project site. It is a small tree that is unlikely to provide a substantial canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended instead such as Toyon

02-10

(*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). 02-10 Cont.

2. Toyon (*Heteromeles arbutifolia*) is a recommended choice as it occurs on the SW-facing boundary with Guajome Regional Park and should be planted in lieu of several other plants currently listed in the project landscaping palette. 02-11

3. American Sweet Gum (*Liquidambar styraciflua*) is listed in the project landscaping palette. However, this tree is listed on California Invasive Plant Council (Cal-IPC)'s emerging invasive plants list for Orange County and likely applies to San Diego County. Source: https://chapters.cnps.org/oc/wp-content/uploads/sites/2/2024/01/doc.2024-Invasive-Report.pdf
It is recommended to remove this from the plant palette to prevent potentially introducing an invasive plant to the two adjacent riparian zones. 02-12

4. Western Sycamore (*Platanus racemosa*), is a recommended choice due to the presence of the tree already on the NE boundary. However, since the project site itself is not a riparian zone but a sloping hillside between two riparian zones, such a tree would need regular irrigation to become established and thrive given their water requirements. It is also the only tree native to the project site likely to provide substantial tree canopy over time. Also, since Western Sycamore hybridizes with non-native London Plane (*Platanus × hispanica*) in California, it is important to source Western Sycamore from reputable growers that have taken precautions against potentially hybridized seeds to prevent further genetic erosion of the species. Source: https://mossmatters.com/assets/pdfs/papers/johnson-platanus.pdf 02-13

5. Strawberry Tree (*Arbutus unedo*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). 02-14

6. Blue Palo Verde (*Parkinsonia florida*) is a California native, but it is a small desert tree that is native to the inland deserts of Southern California. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). 02-15

3

7. Mezcal Bean (*Sophora secundiflora* syn. *Dermatophyllum secundiflorum*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). 02-16

8. Desert Willow (*Chilopsis linearis*) is a California native plant, but it is native to inland desert regions of California and not the project site. It is a small tree that is unlikely to provide a substantial canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended instead such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). Red Willow (*Salix laevigata*) 02-17

9. Chitalpa (× *Chitalpa tashkentensis*) is a non-native, man-made hybrid tree with neither parent native to the project site. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*). 02-18

10. Sweet Bay (*Laurus nobilis*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). 02-19

11. Willow Pittosporum (*Pittosporum phillyraeoides*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). 02-20

12. Pink Trumpet Tree (*Handroanthus impetiginosus* syn. *Tabebuia impetiginosa*) is a non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore 02-21

(*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*). 02-21 Cont.

13. Java Cassia (*Cassia javanica*) is a non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*). 02-22

14. Australian Willow (*Geijera parviflora*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). 02-23

15. Mondell Pine (*Pinus eldarica*) is a non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*). 02-24

16. Holly Oak (*Quercus Ilex*) is non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*). 02-25

Other landscaping issues 02-26

The landscaping plan did not address the specific conditions of the OFD for plantings in the FMZ 0-5' from any building foundations as detailed in App O. See further comments in this letter under Fire Service.

There also is no mechanism specified to ensure the landscaping conditions, especially the requirement for a minimum 12% tree canopy cover are in place for the life of the project. This needs to be included in the conditions of approval with an enforcement mechanism specified. 02-27

Parking description includes 2 car parking stalls in garages for each residential unit, but no additional details. 02-28

Please provide additional information on availability of on-street parking and provisions for guests/vendors to park- not just residents in their own garages. This is especially important because of the numerous restrictions on parking described in App O. 02-28 Cont.

- **Insufficient sustainability provisions**
  In section 3.2.5.1 the two sustainability provisions are part of the minimum requirements of state law and/or Building Code. For this sensitive location we would expect the developer to consider actions far beyond the minimum required by law. See other sections for more specific suggestions on how to reduce adverse impacts with improved sustainable design features. 02-29

- **Need more detail on compliance with Scenic Park Overlay District (SPOD) requirements.**
  These are mentioned in several places, but nowhere have we found any details that confirm compliance with the specific requirements for projects like this that are located within the SPOD. The DEIR specifically says they are in compliance with these requirements, while they are waiving all of the Equestrian Overlay Zone requirements. Compliance with standards in the SPOD for B Grading limitations, C View Preservation, D Building height, E Building materials and finishes, and H Signs are areas of particular concern. 02-30

- **Inconsistent description of waiver for retaining walls**
  Table 3.3-1 says that retaining walls are one of the waivers and notes these will not be plantable. But it is unclear if that is the only waiver related to walls. In other places it talks about softening the appearance of walls with no detail. In our experience plantable walls are often unsuccessful in achieving a reasonable amount of coverage with plants leaving them eyesores. 02-31

- **Poor Circulation access and continued partial dirt road**
  In some places the project proposes to only improve the road frontage along its border which leaves the remainder of Guajome Lake Rd in its current dirt condition. In others, it extends the paving and road improvements to the west up to the intersection with Albright St. The project is adding hundreds of ADT to this road. The entire alignment needs to be considered for improvement, not just for cars but for safety of bicycle and pedestrian access as well. While city guidelines may not require the developer to address the condition of the entire road, the city needs to consider taking further action to ensure the road conditions are addressed to accommodate the changing conditions caused by this project. Other cities would do things like set up a thoroughfare improvement district and require all projects that access the road to pay their fair share towards such needed improvements. 02-32

Aesthetics 02-33

- **Fails to evaluate compliance with Guajome Park Sphere of Influence criteria**

This is the only section of the DEIR that mentions "sphere of influence," others reference the SPOD. Whatever it is called, the DEIR claims the project is consistent with the SPOD, yet it fails to provide any actual analysis of compliance with these conditions. This is in contrast to other land use criteria that are evaluated in great detail for General Plan Compliance as is shown on Table 4.10-1. Specific items in the SPOD that should be evaluated for aesthetics include:

1. F Structures not permitted on slopes abutting the park. In fact, the houses are all built on a slope abutting the park.
2. H Structures shall be oriented to protect views of the park and surrounding properties. The view analysis did not fully consider these views.
3. J transition area required between landscaped and natural areas. No such transition area is identified.
4. I Development shall integrate features such as landscaping, open areas and pathways with those of the park. There is no indication that this has been considered. In fact, access to the pathway within the park that parallels Guajome Lake Rd will be impacted by the project and safe integration between the trails on the north and the park will be a concern because of the increased volume of traffic.

O2-33 Cont.

O2-34

O2-35

O2-36

O2-37

➢ **No documentation of required review with General Plan Sphere of Influence**
On page 4.1-6 the DEIR concludes that the project is within the SOI and therefore would be **subject to** review for compliance. Based on being subject to review it concludes there are no conflicts. The DEIR is the document that should demonstrate the review has been done and the project is in compliance with all of the provisions of the SOI. No such review has been done. This remains a potentially significant impact that has not been addressed.

O2-38

➢ **Outdoor lighting fails to restrict impact to the on-site sensitive habitat**
Page 4.1-9 says outdoor lighting will be "directed downward to minimize light trespass on surrounding properties." This needs to also address light trespass within the property boundaries on the sensitive habitat (to comply with MHCP/SAP edge effect conditions).

O2-39

Land Use

➢ **Fails to properly consider the relationship between General Plan and Zoning Ordinance.**
OPR provides guidance for general plans. Chapter 9 of their guidance document Preparing, Integrating and Implementing the General Plan can be found here and is incorporated by reference https://lci.ca.gov/docs/OPR_C9_final.pdf

It says, "The success of a general plan, particularly the land use element, rests in part upon the effectiveness of a consistent zoning ordinance in translating the long-term objectives and policies contained in the general plan into everyday decisions." The two documents are interrelated. The DEIR has included detailed tables about compliance with provisions of the General Plan, but nothing about compliance with zoning.

O2-40

7

The official Notice of Availability of Draft Environmental Impact Report specifically says "The 16.78 acre project site has a General Plan land use designation of Single-Family Detached Residential (SFD-R) and a zoning designation of Single-Family Residential-Scenic Park Overlay-Equestrian Overlay (RS-SP-EQ)." Both the general plan and zoning designations are key to understanding the land use allowed for this site. The City of Oceanside Land Use and Zoning Map Viewer also clearly identifies the project site as covered by both of these overlay districts.

02-41

➢ **Fails to properly consider the impacts of waiving Equestrian Overlay District**

The Equestrian Overlay District (EOD) is addressed in Article 28 of the City of Oceanside Comprehensive Zoning Ordinance. Under section 2802 it says "This article shall apply to all development projects except as otherwise provided for in this section." Three exceptions are identified, but none are applicable to this project. Section 2808 says that alteration of these standards is allowed "provided further that the general and specific purposes of this Article are achieved." There is nothing that allows waiver of the provisions of the entire EOD unless such alterations would still meet the purpose for which the EOD was established. The DEIR has done no such analysis of the impacts of the proposed wholesale waiver of this section. We note that it appears that an earlier version of the project accommodated horses in a designated common area, and it is still unclear what accommodation for horses, if any, is included with the project-as there is discussion about parking for horse trailers in App O.

02-42

Furthermore the EOD is intended to provide requirements that support equestrian use in a way that is compatible with the neighborhood and surrounding park. Eliminating this from one project in the middle of this zone could have multiple impacts on the adjacent properties and the function of this area to support equestrian use. How are horses supposed to move through this area in the absence of a path on this project, or crossings to the trail on the south side of Guajome Lake Rd. There are horses on the property on the west- how will they be able to leave their site safely? What path of travel will horses need to take to access the park?

02-43

➢ **Inconsistency with prior litigation and past practices wrt waivers of EOD Conditions**

Around the time the EOD was being adopted, there was a lawsuit filed by the developer of Marlboro (sp?) Estates. This project was partially through the entitlement process and did not want to comply with the conditions of the EOD which they considered an illegal taking. There was a settlement agreement reached that allowed the development to proceed, but we believe with some of the conditions of the EOD included. Following adoption of the EOD there have been other projects that asked for waivers of EOD requirements. To our knowledge, in all cases, the city required extensive justification for the waivers and demonstration that the requested waiver would not compromise the purpose of the EOD, and the waiver was specifically approved by the city council. There is nothing in the DEIR that discusses any impact from this prior litigation, or explains why a standard process used for over 30 years to require justification of such waivers was ignored.

02-44

➢ **Waiver for Equestrian Overlay Zone is not allowed under state density bonus law as is claimed.**

There is absolutely no precedent or legislative support to waive specific overlay zones, such as proposed by this project. We refer specifically to the City of Oceanside's Zoning Ordinance Article 28 Equestrian Overlay. Considering this an incentive or waiver was never anticipated nor delineated in the detailed Density Bonus laws. Indeed their legislative purpose is to build houses on residential land *not take all local control away or destroy a city's ability to determine special overlay zones that benefit their residents.*

To point out how illogical that is, the City certainly wouldn't want to override either Base District Zoning regulations or the Overlay Zoning Districts. Indeed the purpose of the base district in residential areas Chapter 10 1010 G is to provide compatible development for public and semi-public uses, exactly what the Equestrian Overlay Chapter intends to do. They should be read together clearly.

Such a waiver would completely eliminate all local zoning at every level. Can you imagine waiving Industrial Zoning to build houses? Or removing the Senior Mobile Home Park overlay and gutting the protections that can give residents? There has to be a limit to what a waiver or concession can consist of. Using common sense such a waiver is *not a design standard in any interpretation of 'design standard'.*

So reading Chapter 10 and Chapter 28 together it is clear both chapters are to be applied, not one to the exclusion of the other. The Overlay Districts are to be compatible with the underlying residential zoning, not in conflict with them. Much as the Coastal Act cannot be overridden by current density bonus laws, nor should the Equestrian Overlay Zone. One protects the Coast and preserves it for the public while the other protects and provides for recreation, animal care and the health and safety and welfare and vistas of the area as well as protecting the adjacent neighbors' property rights to quiet enjoyment of their land and horses. The intent is very clear here.

In reviewing the legislation and its analyses, there is no support or even a hint at waiving Overlay Zoning plans. Waivers and concessions are specified for density, lot size, setbacks, walls, parking, transit requirements etc. *All of those are design or development standards, not zoning standards.* Indeed design standards should be properly integrated with both zoning Chapters.

The rule of Statutory Interpretation generally states that one would read the Density housing rules as specific to housing only; it does not mention incentivizing or waiving or destroying local control of Overlay Zones. To put it another way, it is not logical to assume an Overlay District was ever contemplated as part of waivers and incentives. That is a stretch too far and the law cannot be enlarged in that manner.
Indeed, if something is not mentioned in a statute or law it is presumed to not be part of the interpretation of that law under the theory of *Expessum facit cessare tacitum.* Again,

02-45

9

nowhere in the legislative analyses or statements of intent is there any indication that building houses should override a local zoning overlay that provides for Equestrian uses. Again it's not logical or legal to eliminate or completely ignore the intent of the overlay district. Nor is it a logical interpretation to 'assume' overlay zones are included in the rather specific density housing rules. The clear meaning of the statute is to build housing, not destroy other local planning efforts. The clear meaning of Oceanside's zoning ordinance is to have the overlay district be compatible with underlying zoning, not eliminate it. We have not seen this type of zoning waiver in any other project in Oceanside.

Any development with a special overlay should and must be *compatible* with existing zoning regulations otherwise why have them at all? The intent of the density bonus rules is not to destroy quality of life and local planning efforts. There is no logical reason to exclude the equestrian aspect of this property other than to simply build houses and eliminate public benefits and overlapping plans for the area.

O2-45 Cont.

<u>The intentions of Chapter 28 are extremely clear</u>.

1. To provide for the public equestrian recreational opportunities and trails exactly in the Guajome area where this project is proposed. The project proposes nothing in this regard, no trails and teeny, tiny artificially created green space inside the project and not accessible for the enjoyment of the public.
2. To provide appropriate design standards for the safekeeping and protection of horses on said property. The project proposes to eliminate horses. There is no legal precedent upon which to eliminate that clear requirement and intent.
3. To enhance and provide an equestrian and rural atmosphere. Again this is completely destroyed/eliminated by the interpretation in the study that such intent can be waived.
4. To provide a pleasing and compatible relationship between buildings and a buffer between equestrian and non-equestrian uses. Again, the intent is clear. This area must provide horse amenities, trails, and open space. The proposal proposes to eliminate any equestrian uses. Again, this is not something that can be waived.

O2-46

O2-47

O2-48

O2-49

Furthermore the intent of the **Ch 28 EO to be primarily is very clear in the language itself :**

"2804 Allowable Modifications to Development Standards Development regulations of the underlying base district shall be modified by the designation of an EQ Overlay District to accomplish the stated purposes of the EQ Overlay. Where conflict occurs between the provisions of the EQ Overlay District and base district regulations or any other section of the Zoning Ordinance, the EQ Overlay District shall control. "

Further the elimination of an equestrian atmosphere and horse keeping is sure to cause conflict with the adjacent neighbors who do keep horses to the west and to the south. Horses

O2-50

can generally cause noise, dust and odors. The seminal case on nuisance, the Del Webb [1]case incorporated by reference clearly shows that moving residential uses near a cattle operation caused conflict, nuisance and reduced the value of the agricultural use and value of the land. In this case, adjacent homeowners may experience the same conflict with highly dense residential uses that are adjacent to their homes, yards and horses. The City should not sacrifice their home values and peace and quiet due to an inappropriate application of density bonus laws and waivers.

O2-50 Cont.

The conflict with the Guajome Regional Park Sphere plans and intentions will essentially limit or destroy the purpose of that plan. Again, there is not a shred of legislative intent that a new density bonus development should be able to negatively impact local control and regional planning nor remove public benefit from the uses of this land.

O2-51

Last, the adopted Housing Plan demonstrates this land is not needed to satisfy the number of units required to be met. It was never planned for high density beyond what is delineated in the Equestrian Overlay chapter. In fact that says just the opposite- the land is to be built to retain all *the public benefits* as specified in the Chapter. That is why this property was never on the list of proposed zoning changes for greater density.

The developer is entitled to his bonuses and individual waivers, but not a waiver of the Equestrian Overlay District and they cannot waive the stated intention to preserve the benefits included within it. This project needs to study the impacts on the loss of these public benefits and the impacts on the surrounding properties including the regional park. Any specific waivers of EOD requirements must require justification as has been city practice on other EOD waiver requests.

O2-52

A recent HCD letter on another project (included as Att E) specifically discussed the ability of the local agency to request justification of requested waivers. That clearly needs to be done with this project.

O2-53

➢ **Potential cumulative impacts of EOD waiver.**
According to a resident of the EOD, at the time the original EOD was adopted there had already been several property use changes that compromised the existing equestrian oriented neighborhood. The EOD was adopted to protect the existing uses. Included within the EOD was the intent to improve connectivity of the horse trails, provide for safe crossing of roads, and improve access to Guajome Regional Park. None of those anticipated improvements actually occurred. There was neighborhood opposition when the initial waivers were requested for ADU's. Adjacent residents were concerned that there would be limitations placed on their future property use as things like corrals could not be located

O2-54

[1] [1] Spur industries Inc. versus Del E. Webb Development Co 108 Ariz. 178, 494 P.2d 700, 1972 Ariz. 4

within so many feet of a residence and now the adjacent property had two residences on site instead of one. While the city required justification for waivers, they were approved. And as had been anticipated, the neighborhood concern that such waivers would make it harder to continue horse use in the neighborhood proved to be true. The consequence was that over time a number of properties discontinued horses on site, especially in Jeffries Ranch. This became the start of a long slow process that reduced horse use in the neighborhood that had special conditions added that were supposed to protect these uses. All of these previous waivers were for small modifications, such as adding an ADU, and none included waiver of all of the provisions of the EOD.

It is reasonable to expect that waiving all of the conditions of the EOD, with no requirement to justify such waivers, will adversely impact the function of the EOD and ultimately will result in more such projects. All of the EOD property owners that supported the EOD, and many of whom provided additional funding to maintain the horse trails will have the use of their property compromised, further exacerbating the future rate of conversion of these properties from one that supports horses to one that does not.

Furthermore, adding dense housing next to a horse corral is expected to result in the common kind of nuisance complaints that occur near agricultural land uses. Residents are aware at the time that they are near horses. But they still complain about the smell and other impacts from their presence. To protect agricultural areas from such complaints it is common to adopt Right to Farm ordinances. There is nothing similar to this to protect these horse properties.

Additional mitigation is needed to protect the intent of the EOD from such cumulative impacts. This should include consideration of a Right to Horses ordinance,similar to those used for Right to Farm ordinances in agricultural areas. It should also include the requirement to justify the EOD waiver and require explanation of how it will not adversely impact the intent and purpose of the EOD.

O2-54 Cont.

Air Quality and Greenhouse Gasses (GHG)

- **Computation/typo errors in App B section 2.4.2.1**
  Text says grading will occur for one month from "July 24 to August 23." It appears this was intended to be "July 23 to August 23." This describes a project of 84 units with 9 affordable whereas the DEIR project description is 83 units with 4 affordable. This inconsistency should be noted with a statement about how it impacts the final computation (we expect this would be negligible but without correction it remains an inconsistency).

O2-55

The delay in project completion could have a significant impact on the compliance with VMT/capita threshold. The DEIR notes an 18 month construction schedule and on page 33 says it will be operational in 2024. However, the project has yet to secure entitlements which reasonably would take at least 6 months, followed by 18 months construction. It therefore could not be operational until 2027 at the earliest. Since VMT/capita is required

O2-56

to decrease over time this results in the wrong threshold being applied, i.e. 2024 instead of 2027 which would require additional emission reductions. 02-56 Cont.

- **Fails to properly comply with conditions of the SDAPCD**
  For example, dust control strategies in section 1.5 says "Speeds on unimproved roads shall be reduced to less than 15 mph." Speeds are limited to 15, not less than 15. Furthermore, dust control measures are only applied to construction although the dirt road will continue to cause dust issues throughout the life of the project. Page 10 of Appendix B specifically identifies "dust stirred up by vehicles traveling on roads." as a source of dust pollution. On page 11 it says Visibility Reducing Particles are those that "obscure viewshed of natural scenery." (Applying to PM 10 and PM 2.5.) This dirt road is adjacent to natural lands of Guajome Regional Park and even a casual observation shows substantial dust impacts to the viewshed—just from a single car driving along the street. Furthermore, there is no restriction to 15 MPH to reduce fugitive dust. Page 13 identifies 'parks and playgrounds " as land uses with sensitive receptors, yet the adjacent Guajome Regional Park has not been evaluated for impacts on such sensitive receptors. On page 18 it notes that the recommendations of the 2005 SDAPCD additional guidance re control of PM (because the region is a nonattainment area). This includes source control measures to address "unpaved roads and windblown dust." All of these dust control measures from the SDAPCD need to be brought forward into the project design and conditions of approval. 02-57, 02-58, 02-59, 02-60

- **Error on page 33 Table 8 where it says VOC threshold is "Not" exceeded**
  This appears to just be a significant typo as the numbers show the threshold is exceeded and the text that follows discusses the cause and mitigation proposed to address this. 02-61

- **Unclear analysis of impacts, both for project and 90 townhome alternative**
  Page 28 of App B notes natural gas use for space and water heating. This is one of the sustainability measures that should be addressed by making this an all-electric project. That would reduce fossil fuel used, improve indoor air quality and safety and reduce construction costs. 02-62

- **Fails to identify conflicts with appropriate Air Quality Plan (AQ)**
  The adopted AQ assumes that growth is consistent with the SANDAG growth projections. On page 30 of Appendix B, it explains this as complying with the need for 5,443 housing units by 2029. But that fails to account for housing by income level which is also a key part of the growth projections. This project proposes to add only 4 affordable housing units, although Oceanside is far short of achieving the housing for that income level. It also fails to note that the city is already projected to exceed the target for above moderate housing. Furthermore, above moderate housing units consume more energy and emit more GHG than the smaller units built for lower income levels. As further discussed under Population the project is not consistent with SANDAG growth projections. 02-63, 02-64

- **DEIR references the 2008 CARB Scoping plan but should be updated to the 2022 version.** 02-65

The current version provides much more specific guidance for local jurisdictions. But even the 2008 version includes the bottom-line goal of achieving 6 MT/capita by 2030 which is necessary to meet the threshold of SB32 and AB 197 for 40% below the 1990 levels by 2030. The DEIR has not evaluated compliance with this key goal from the CARB Scoping Plan. 02-65

➢ **inconsistent statement about gas fired fireplaces**

Page 29 of App B says that PDF AQ-1 Restricts both woodburning and natural gas fireplaces. But the actual AQ mitigation measure AQ-1 only specifies low VOC materials, and AQ-2 only restricts wood burning and not natural gas fireplaces. It is unclear if natural gas fireplaces have been included in the emission calculations or not. If not, this potentially could result in greater GHG emissions, particularly for cumulative impacts. 02-66

➢ **Inaccurate statements about housing compliance**

Page 31 notes that the majority of these housing units will be above market rate. Other places in the DEIR discuss housing compliance, particularly related to RHNA housing needs. What this ignores is that addressing housing needs is not just achieving the total number of housing units, it is achieving the number of units for each income level. Oceanside already has exceeded the need for above moderate housing so this project is not on a trajectory of compliance with housing goals as it will result in an even greater excess of high cost housing. 02-67

➢ **The CAP Checklist has not been provided/verified and is not allowed as CEQA analysis of impacts**

The DEIR assumes consistency with the CAP Checklist is sufficient to claim there are no significant GHG impacts, yet the Checklist has not been included with the DEIR documents provided, nor is there any indication that it has been signed/verified by staff. The City of Oceanside Climate Action Plan Consistency Checklist says the Checklist is supposed to be submitted "concurrently with the initial entitlement application." It further states the Checklist is to be used for CEQA review of new developments. However, it also states that use of the Checklist is only sufficient for projects that "meet one or more of specific locational criteria." The following includes shortened version of each of those locational criteria and our conclusions about it being met: 02-68 02-69

1. Within a Smart Growth Opportunity Area – No 02-70
2. Within 1/4 mile of a priority TOD – No
3. Consistent with current land use and zoning – No. Proposed project is not consistent with current zoning. In fact, it is requesting a waiver of many zoning conditions (EOD) and it has violated others (SPOD) that have not been properly identified. 02-71
4. Analysis that proposed project would produce fewer GHG than current land use-consistent with surrounding zoning district and verified by a third party expert. – No claim was made nor was such analysis done. 02-72

Since the project fails to meet any of the identified location criteria further analysis of GHG is required. The Checklist further specifies that this includes VMT analysis, consistent with the provisions of the City of Oceanside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and (VMT) and Level of Services. Table 5 of those guidelines further specifies that residential projects that generate 500 or greater ADT are required to meet the threshold of a 15% reduction of VMT from the regional average.

No such analysis has been done. The project is not in compliance with the CAP provisions for CEQA analysis of GHG impacts. Since the project includes no features that would be expected to result in a VMT reduction this remains a potentially significant impact that has not been properly analyzed or mitigated.

O2-73

- **Project still shows a small amount of natural gas use**
  We would like to see this clearly defined as an all-electric project with no natural gas infrastructure and with the inclusion of additional Title 24 voluntary measures.

O2-74

- **No assurances of Checklist compliance over the life of the project**
  There needs to be a mechanism that ensures the minimum 22% pervious cover and 12% tree canopy cover provided initially are maintained throughout the life of the project. This mechanism needs to be specified in the conditions of approval.

O2-75

- **There are no plans to accommodate increased EV use over time**
  The project meets the current minimum requirements for EV hookups/charging. But there is no discussion as to how this will be addressed as California moves to 100% EV's. GHG analysis is a cumulative impact so this needs to be addressed for the life of the project that includes responding to this known change in future conditions.

O2-76

Biological Resources

The project is not in compliance with several provisions of the Oceanside SAP
Several of these specific issues are discussed below. But the key issue is that failure to comply with the SAP results in potential adverse impacts to biological resources-- direct impacts, indirect and cumulative.

O2-77

- **Impacts to sensitive habitat are not allowed to accommodate Fire Management Zones (FMZ)**
  Per the MHCP those impacts should all be within the development footprint. There is no figure that shows exactly where, and by how much the project has failed to comply with requirements of the 0- 30' FMZ 1- just text that says the FMZ varies from 0-30' in spite of the fact that it shows a consistent 30 ' width for this zone on Figure 3.

O2-78

Page 1 of App C says "... southern FMZ will include ...between 19 and 70 feet of on-site zone 2 thinning for fuel modification, and off-site equivalent fuel modification." What exactly is this "equivalent" off-site fuel modification? And where does this occur?

02-79

Furthermore the FMZ does not appear to properly identify impacts to adjacent lands. Table 5 of App C identifies .31 acres of impact from the improvements to Guajome Lake Rd. It appears that at least part, if not all, of these off site impacts are affecting Guajome Regional Park. The analysis of these offsite impacts should discuss how they affect the biological resources in the park- which may be greater than just accounting for the direct impacts- especially at the low proposed mitigation ratios (.5:1)

02-80

- **Impacts are not specified to existing hardline preserve.**
  The text identifies that there is overlap with what is identified as hardline preserve in the MHCP/SAP- but there is no figure that identifies where this occurs or any details about the extent of this. The SAP specifically requires 90-100% of hardline preserve to be permanently protected and per the DFW comment letter on the NOP since this is identified as a Focussed Planning Area(FPA) in the MHCP there should be no impacts within this zone. Without knowing exactly how much of this existing hardline has been impacted it is impossible to determine if this standard has been met. But it appears this is not consistent with the MHCP/SAP.

02-81

- **Ignored WLA recommendation for impacts to be mitigated on site.**
  The WLA's recommended that mitigation occur on site because this is part of the MHCP FPA. While there has been substantial avoidance of on-site impacts, mitigation is still proposed at an offsite area, with no explanation of how this is equivalent to what was recommended.

02-82

Furthermore, the sensitive habitat that has been avoided is not being treated as mitigation. There is no active management or monitoring proposed, only minimal actions specified for the HOA, and no endowment that ensures that these resources will in fact be preserved in perpetuity.

02-83

- **Fails to comply with buffer requirements of the SAP.**
  The SAP identifies requirements for a 50' biological and a 50' planning buffer from the edge of the riparian habitat. The text implies these buffer conditions have not been met, but fails to provide the details that show exactly where, and to what extent, such reductions in the buffers have been made. Page 9 of App C concludes reductions in this buffer are acceptable if approved by the city . It says "However, because the subarea plan has not been approved by the city, these buffers and setbacks are subject to reduction based on approval by the city." The project is still subject to conditions to be included after consultation within the WLAs' , both for habitat impact and Streambed Alteration permits. MM Bio 11 specifically says the project will comply with the conditions of future Section 10 consultation (for habitat impacts) which is not consistent with this conclusion.

02-84

On page 31 it says that the landscaped manufactured slope will serve as part of the buffer and "avoids the need to thin in the habitat." Again, this area of impact has not been properly identified. The DEIR has failed to fully identify, analyze or mitigate for impacts to the buffers. This remains a potentially significant adverse impact. 02-85

- **The correct mitigation ratio for impacts to CSS per Table 5-2 of the SAP is 3:1, not 2:1 as proposed.**
  The referenced footnote 6 to Table 5-2 appears to be the justification for reducing this requirement but it is not applicable to this project in the Off-site Mitigation Zone. The correct mitigation ratio for occupied CSS habitat is 3:1. 02-86

- **The DEIR fails to discuss impacts on local wildlife movement corridor**
  The SAP requires evaluation of project impacts on local wildlife movement corridors. The DEIR only evaluated impacts to the regional north/south wildlife movement corridor identified as the Wildlife Corridor Planning Zone in the SAP. Wildlife typically move along riparian corridors, and between riparian corridors and large open space areas like Guajome Regional Park. In Oceanside the San Luis Rey riparian corridor and others are important for local east/west wildlife movement. The DEIR has failed to discuss any such impacts to local wildlife movement corridors caused by the project. 02-87

The project proposes direct impacts to CSS on site. One of these patches included CAGN nesting. The DEIR has failed to discuss how the project will impact future CAGN dispersal, a specific kind of local wildlife movement corridor.. CAGN can move through a landscape with patches of CSS, based on line-of- site and other conditions. How will eliminating these CSS patches effect dispersal along the northern part of the site? What is the distance between CSS patches along this riparian corridor if those on the project site are impacted? On Page 30 it assumes the remaining riparian corridor provides adequate habitat linkages for CAGN but there is no analysis that supports that conclusion. 02-88

Where wildlife movement corridors are already compromised (like they are in the northern riparian area on site), it is important to provide redundancy. Having more than one way to move through a landscape increases the success of dispersal. See further discussion of factors affecting CAGN dispersal included in the study Ca Gnatcatcher Corridor Study Evaluation of the Northern Connector Through the Wildlife Corridor Planning Zone in the City of Oceanside CA, incorporated by reference. 02-89

- **Please clarify where the Quarry Creek mitigation bank site is located and remaining credits**IR says the direct impacts to both CSS and NNG will be mitigated through the creation of 6.64 acres of CSS at the Quarry Creek mitigation bank. We are not aware of the establishment of this mitigation bank. If it is within the Quarry Creek development in the city of Oceanside this area is not within the boundaries of the WCPZ. For this project these direct impacts are required to be mitigated within this zone. 02-90

- **Insufficient management of the sensitive habitat proposed to be maintained by the HOA.** The DEIR states that the project avoids impacts to riparian, CSS and NNG habitats and that these areas will be managed by the HOA to ensure "no trespassing into the natural habitat and that they are kept free of trash." Those two items alone are insufficient to ensure the biological integrity of this sensitive habitat. Full edge effect conditions should apply to this area and be the responsibility of the HOA to monitor and enforce. 02-91

- **Indirect impacts to sensitive habitat have not considered operation of the project** The project only discusses potential construction indirect impacts, not those from operation of the project. MM Bio 3-10 also only addresses construction impacts and not the on-going permanent impacts that will occur from operation of the project. Given that the project site includes what is, and will continue to be, hardline preserve, the edge effect conditions from the MHCP need to be included as project conditions. These conditions were routinely used by the City for several years but have not been addressed with this project. Failure to address these results in potential indirect impacts that have not been mitigated. These standard edge effect conditions are included as Att A and should all be included with this project. 02-92

- **MM Bio-2 needs to also address locally invasive plants** The DEIR does specify that potential landscaping impacts will be addressed by insuring no invasive plants are included based on the CAL- IPPC list. In addition to that, the San Diego Natural History Museum publishes a list of plants that are locally invasive. This list needs to also be included. 02-93

- **MM Bio 11 illegally defers mitigation to future Section 10 consultation.** Of course the project will need to comply with numerous future actions that have not yet been specified, for example changes to the Building Code. But the DEIR analysis is supposed to identify all such known impacts and provide proper mitigation with the EIR, not defer this to a future action. This is of particular concern because such consultations are not part of a public process and there is no opportunity for the public to evaluate whether any proposed modifications are sufficient . This sounds like there is an expectation that there are impacts that have not been adequately identified, analyzed and mitigated in the DEIR and instead of doing that it is proposed to just include this generic mitigation measure to comply with these in the future. 02-94

- **The DEIR has not identified potential direct or indirect impacts on Guajome Regional Park from the modifications to Guajome Lake Rd.** Throughout the DEIR it has failed to properly consider direct and indirect impacts on the park. The DEIR notes that Guajome Lake Rd will be realigned and widened and that this will impact the park. Yet there is no figure that shows the extent of this impact or analysis of the potential impacts.(Only a table that indicates the number of acres impacted.) There is extensive sensitive habitat within the park. Both the construction and operation of this 02-95

realigned road, with potentially higher traffic volumes, could impact the biological resources of the park. 02-95 Cont.

Noise

- **Please restrict construction to M-F**
  Saturday construction can be allowed by permit. But considering the project is adjacent to a regional park, Saturday construction should not be allowed. 02-96

- **Potential off site noise impacts were not properly identified or mitigated if needed**
  Figure 2 Site Plan does not indicate any off-site construction impacts. There will be impacts from the improvements of Guajome Lake Rd for 420' along the frontage to the park, into the park, the extension of paving to the west of the project up to Albright St, and the estimated 2,000 foot sewer line extension to the project site. The analysis needs to also include these potential off site noise impacts. 02-97

- **Private sewer lift station noise not evaluated**
  App N Sewer System Analysis identifies an on-site sewer lift station. It appears this was added after the noise analysis was done and it therefore was not included in the noise analysis. These stations can be very loud and may require mitigation. 02-98

- **We did not see restrictions on the type of lawn equipment to be used, which can be a major source of excess noise (and GHG).** Please include proper analysis and mitigation if needed for this potential impact from lawn equipment. 02-99

Hydrology

- **Inaccurate project description**
  App H says the site is an existing vacant lot covered in natural vegetation. In fact, as reported elsewhere in the DEIR, there is an existing single family home and shed on site and most of the vegetation on site is not natural. On page 17 of 390 it says the paving of Guajome Lake Rd is only along the project frontage while in other places paving extends past the project to the west. On page 20 of 390 it says the majority of the storm water will travel south across Guajome Lake Rd through culvert . This does not seem consistent with the details for drainage shown in App H and I discussed further below. 02-100

- **Unclear statements about existing hydrology**
  Page 1 of App H says basin EX-1 "appears " to output to Guajome Lake Rd at low spot..." Page 2 says Basin EX-3 "appears to continue northwest to outlet to Guajome Lake within Guajome Regional Park." The hydrology technical studies are expected to confirm actual existing conditions—not just conclude what "appears" to be the case. There is also no discussion about any historical issues with site run-off, particularly to the adjacent Guajome 02-101

Regional Park. Is there obvious erosion around the road low point or the culvert under the road?

02-101 Cont.

- **No figure showing basin drainage post project**

  Pre-project conditions are shown that identify the three drainage areas of the site. Text says this basic drainage pattern essentially remains post project. But there is no site plan that shows post project areas of drainage and what flows to the identified basins and structural BMP's. While the detailed site plan shows the location of these it does not show the limit of post project drainage areas in order to confirm this remains substantially similar. App A to App H provides details for each of the three areas as summarized here:

Area	Pre Project		Post Project	
	Acres	CFS	Acres	CFS
NW	4.14	7.77	5.28	7.66
SW	4.34	8.35	4.76	8.29
NE	1.92	5.15	.38	1.01
Total	**10.4**	**21.27**	**10.4**	**16.96**

  This indicates the overall volume of drainage has declined substantially particularly the area that drains to the NE. Please provide further clarification of this apparent inconsistency.

02-102

- **Required Justification for use of run-off coefficient of .35 for undisturbed natural land has not been provided**

  App A to App H includes Table 3-1 from the SD County Hydrology Manual page 3-6. This includes the runoff coefficient for identified land uses. It adds a qualifier to the use of .35 (0% impervious cover) that it must be undisturbed in perpetuity and that "justification must be given that it will remain natural forever." We find no such justification nor do we find anything that assures all of these areas will remain impervious in perpetuity. Both of these issues need to be addressed for this analysis to comply with the requirements of the Hydrology Manual and for this coefficient to be acceptable to use.

02-103

- **Boiler plate information provided for structural BMPS**

  For example, page 59 of 390 in App I shows an example from 43rd St and Logan Ave. in San Diego. Further explanation is needed to clarify what changes, if any, are proposed to the generic information provided to make them specific to this project.

02-104

- **Error on Site Design BMP Checklist**

  Page 28 of 390 has checked "Yes" natural lands are conserved. The text specifically says that arroyo willow riparian forest and coastal sage scrub on the northern portion of the site will not be impacted. This is in conflict with the BTR that shows there are impacts to coastal sage scrub.

02-105

- **Failure to consider impacts of increased traffic on dirt road**
  Guajome Lake Rd already experiences washboard conditions from winter rains. The project proposes to leave a portion of this road as is, while greatly increasing the traffic volume. This is likely to result in increased erosion impacts on this road that need to be addressed. GThis is further support for paving the remainder of the road if this project proceeds instead of leaving a portion of it dirt.

O2-106

Transportation

- **The DEIR has not adequately assessed compliance with state and local requirements to consider "complete streets" with the proposed modification to Guajome Lake Rd.**
  The City of Oceanside General Plan Circulation Element (CE) page 8 states: "It is recommended that all transportation projects, new or retrofit shall be reviewed for opportunities to improve safety, access and mobility for all travelers and recognize pedestrian, bicycle and transit modes are integral elements of the transportation system." Appendix K the draft LTA says the project will build the missing sidewalk only along the project frontage, and only on the north side of the road. There will be no bike lanes or facilities. The nearest transit stop is 1.3 miles. This clearly is not designed as a "complete" street.

O2-107

- **Unreasonable assessment of current and cumulative traffic impacts.**
  We did not find current traffic counts confirming existing conditions. Simple observations and reports of residents along this reach of Guajome Lake Rd reveal that there is substantial cut-through traffic. This includes school pick up and drop offs for Guajome Crest Academy, among others. While the project itself might not reach the nexus to pave this entire dirt section of the road, the city certainly should. While there are no other projects currently in the approval process that would access this reach of Guajome Lake Rd, essentially all of the existing parcels along the roads off of Guajome Lake Rd have only this single way in or out. There is a potential for a substantial increase in residential units from all of these roads, with or without density bonus additions.

O2-108

- **The DEIR has not confirmed that the proposed roadway improvements to Guajome Lake Rd are consistent with the adopted Circulation Element**
  Page 13 policy 3.7 says the city "shall adopt special alignment plans when 'standard equal-sided widening is not adequate for future needs or where specific conditions exist that require a detailed implementation plan." It appears the project is proposing widening on only one side yet the justification for this has not been provided- especially since the widening is only on the park side of the road. Policy 3.21 requires landscaping along redesigned roadways-which has not been discussed.

O2-109

➢ **Unclear if it meets all of the CE design criteria for a 2-Lane Local Road shown on page 24, Table 3-1**

TABLE 3-1
CITY OF OCEANSIDE STREET DESIGN CRITERIA

Design Elements	6-Lane Prime Arterial	6-Lane Major Arterial	4-Lane Major Arterial	4-Lane with TWLT Secondary Collector	4-Lane Secondary Collector	2-Lane with TWLT Collector	2-Lane Collector	2-Lane Local	Cul-de-Sac Street	Private
Volume Capacity	60,000	50,000	40,000	30,000	25,000	15,000	10,000	2,200	Less than 200	Less than 500[2]
Design Speed	60 mph	55 mph	55 mph	45 mph	45 mph	35 mph	25 mph	25 mph	25 mph	25 mph
Stopping Sight Distance[1]	580'	500'	500'	360'	360'	250'	200'	150'	150'	125'
Minimum Spacing of Intersections[3]	2,600'	1,200'	1,200'	600'	600'	300'	300'	200'	NA	200'
Right-of-Way[4]	124'	124'	100'	84'	74'-80'	70'	60'-70'	56'-60'	56'	VARIES
Curb-to-Curb Distance	104' 16' Median	104' 16' Median	80' 16' Median	64'	54'-60'	50'	40'-50'	36'-40'	36'-40'	40'-36' 32'-28'[5]
Minimum Traffic Index	10	10	9	8	8	7	6	5	5	5
Minimum Structural Section[6]	6AC/8AB	6AC/8AB	6AC/6AB	5AC/6AB	5AC/6AB	4AC/6AB	4AC/6AB	3AC/6AB	3AC/6AB	3AC/6AB
Access to Adjoining Property	None	None	None	Where no other access is possible	Where no other access is possible	Where no other access is possible	Limited Access	OK	OK	OK
Minimum Horizontal Radius Without Superelevation	1,000 2,200	1,000 1,800	1,000 1,800	750 1,100	750 1,100	500 600	350 N/A	200 N/A	200 N/A	200 N/A
Maximum Grade	6%	8%	8%	8%	8%	8%	10%	12%[7]	12%[7,8]	12%[7]
Minimum Grade	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%
Maximum Intersection Grade	3%	3%	3%	4%	4%	5%	5%	5%	5%	5%
Curb Return Radii	35'	35'	35'	35'	35'	30'	30'	25'	40'	25'-35'
Street Lights Location per Standard Drawing No. M-4[9]	30,000 lumen 200' staggered	30,000 lumen 200' staggered	30,000 lumen 200' staggered	30,000 lumen 250' staggered	30,000 lumen 250' staggered	9,500 lumen 250' one side or staggered	9,500 lumen 250' one side or staggered	9,500 lumen at all intersections 250' spacing one side of street	9,500 lumen at mid-block if less than 200'	9,500 lumen at all intersections 250' spacing one side of street

02-110

➢ **The project has waived the requirements of the Equestrian Overlay Zone, but that does not specifically address all of the equestrian related requirements in the CE**

6.2 Equestrian Facilities includes an objective to "preserve and enhance trails in the vicinity of Guajome Regional Park." Policy 6.11 expands on that to include "the city shall protect and maintain the equestrian trails as a form of recreational opportunity as part of implementing the city's Recreational Trails Element." It also specifically mentions providing safe crossings to Guajome Park. The project has not complied with these requirements from the CE, yet it claims to be consistent with the General Plan.

02-111

The Recreational Trails Element is a sub element of the CE, was adopted in 1995 and reformatted in 2002. Page 9 of that document describes the Equestrian System component of recreational trails. This includes objective 6.1 to implement the Equestrian Circulation Master Plan shown on Figure RT-2. Goal 7 on page 12 is to "Enhance equestrian trail facilities in the Equestrian Overlay District. This includes three specific objectives: to continue access to Guajome Park, strive for master planned connections to the park, and to develop additional design standards. All of these have been ignored, contributing to impacts on the park.

02-112

➢ **Failed to consider safety impacts of horses crossing Guajome Lake Rd.**

Car/ horse collisions and avoidance of such collisions are dangerous for both the horse and rider and the occupants of the vehicle. These unsafe conditions already exist since no actual horse crossings have been provided in spite of the number of horses accessing the park from the north side of Guajome Lake Rd. With the proposed extension of Melrose Rd several years ago there was a requirement to provide special controls to activate crossing

02-113

signals that could be accessed by a rider on a horse. The incidence of such potential crossing conflicts is expected to increase substantially given the increased volume of traffic on Guajome Lake Rd. The project needs to specifically address the safety of potential conflicts with horses crossing the road.

O2-113 Cont.

- **Project is in a high VMT area and exceeds the regional average VMT/resident**
  Appendix C to Appendix L states the census tract the project is located in has 19.1 VMT/Resident and the regional mean is 18.9 VMT/Resident. The project has not properly evaluated its GHG impacts and its location within an area with high VMT makes this even more concerning.

O2-114

- **Issues with draft Local Transportation Assessment dated April 19, 2023**
  This says the project will build missing sidewalks, but this is only a single sided sidewalk and appears to only extend along the project frontage with no sidewalk connections past the project frontage to the east or west. No bike lanes or facilities are provided and the closest transit stop is 1.3 miles away. The cumulative impacts conclude there are no other projects adding traffic to this reach of Guajome Lake Rd. However this fails to consider that many of the roads in this area have a single access to Guajome Lake Rd so any increase in intensity of use on all of those roads will result in increased traffic on Guajome Lake Rd. The presence of so many roads with a single access is a major factor to consider- both for general circulation and for impacts when there is a need to evacuate.

O2-115

- **Unknown if applicant has coordinated with adjacent jurisdictions as is required**
  Per page 7 the applicant is responsible for this coordination. This would include both the county of San Diego and city of Vista, two jurisdictions that will also be impacted by increasing traffic and roadway construction. Please provide verification that this required coordination has taken place.

O2-116

- **Issues with compliance with ECAE Policies of the General Plan**
  ECAE Policy 1c-3 requires outreach and educational materials promoting energy efficiency at point of sale. Policy 2c-4 requires the city to ensure improvements are consistent with the city's Complete Streets Program. There is no mention of compliance with these policies.

O2-117

Energy

- **Construction energy use fails to include off site construction of road and sewer**
  These off-site impacts should be consistently included in the DEIR.

O2-118

- **Failed to include the required VMT analysis**
  This section and the GHG section both conclude that the project is exempt from further analysis of GHG as it complies with the Checklist and based on the false claim that it meets one or more of the four exemption criteria. Specifically that is because the project is considered to be "consistent with current land use and zoning." Great detail is provided in

O2-119

multiple locations about compliance with Land Use goals and policies in the General Plan including Table 4.10-1. However, there is no such analysis for compliance with zoning requirements. Page 4.10-9 discussion of compliance with the Zoning Ordinance merely goes through the details of computations for density bonus. In fact, the project specifically waives compliance with the zoning requirements for the Equestrian Overlay Zone. It can't both waive compliance and claim to be exempt from further energy analysis based on the compliance that has been waived. In addition, there has been no documentation of compliance with numerous conditions of the SPOD as discussed in these comments. We believe the project also fails to comply with numerous provisions of the SPOD which further invalidates the claimed exemption based on zoning compliance.

02-119 Cont.

The DEIR has falsely claimed it is eligible for an exemption from further analysis of GHG. Further analysis as described in the CAP is required in order to determine that there are no significant impacts from GHG.

02-120

➢ **The project includes substantial use of natural gas and is not in compliance with 2022 CARB Scoping Plan**
The buildings are projected to use 669,031 kWh of electricity and 2.37 million thousand BTU natural gas/year. We found no details on what the natural gas is being used for. But residential projects are the easiest land use to support all electric buildings. Eliminating the use of natural gas reduces construction costs, improves safety, improves interior air quality and reduces GHG emissions. The 2022 CARB Scoping Plan includes measures for decarbonization of residential and commercial buildings. The standard for residential land uses is "all electric appliances by 2026." The project will not be operational until 2027 and should comply with this standard.

02-121

➢ CAP Checklist has a number of issues discussed under GHG.

02-122

Geotechnical

➢ **Drainage description is not consistent with hydrology report**
App G says " Surface drainage is directed toward the southwest and northeast on their respective ridge sides." App H Hydrology review says the majority of the drainage is to the southeast, across Guajome Lake Rd.

➢ **Private on site sewer lift station not evaluated**
Page 11 Section 5.3.1.6 notes "sewer utilities have not yet been designed." It further states such future details would require further review to ensure BMP's are not within 10' of sewer utilities. Further analysis of this is needed based on the design of the sewer system shown in Appendix N.

02-123

➢ **Geotechnical report recommendation are not properly carried forward into the DEIR**

02-124

The report states that further review at various stages of the project is needed to ensure there are no adverse impacts. The DEIR failed to identify the need to comply with geotechnical recommendations or the need for further review. These impact both construction and operation of the project. For example, under landscaping maintenance it notes the importance of avoiding overwatering. It also says "An abatement program to control ground-burrowing rodents should be implemented and maintained. This is critical because ground burrowing rodents can decrease the long- term performance of slopes." It also says to avoid landscaping next to foundations. The DEIR needs to properly conclude that there could be significant impacts unless the recommendation of the Geotechnical report are complied with. This needs to be a formal Mitigation Measure with accountability for performance and an enforcement mechanism.

02-124 Cont.

Public Services

Water Service

- **Unclear if additional demand has been included for fire sprinkler system in each residential unit.**

02-125

- **Unclear what is "public" vs "private**
  Figure 3 shows the 2 8" waterline connections to the existing 10" main along Guajome Lake Rd, as well as the line on the interior street. Does all of this become part of the public infrastructure once built? We would like to see a summary of infrastructure additions and the costs of their construction and on-going maintenance that will be paid for by the taxpayers of Oceanside, and not this developer.

02-126

Sewer Service

- **Off site impacts for sewer system extension from Old Ranch Rd are not accounted for.**
  Figure 3-2 in project description only shows the paving of Guajome Lake Rd to Albright as an off site impact, not the 2,000 foot sewer line. Also, the construction Air Quality impacts have not accounted for this sewer extension. We do not see anywhere that the sewer system extension has been addressed in potential project impacts.

02-127

- **Need to address in perpetuity requirements to manage any private sewer system component**
  The lift station is within the project footprint and is identified as "private." There needs to be conditions that ensure adequate management of this facility. Will that be the responsibility of the HOA and what is the enforcement mechanism?

02-128

Fire Service/Wildland Fire

- **Inconsistent project description**

Page 5 of App O (and others) says the project is for 84 single family residences with 9 affordable whereas the DEIR project description is 83 with 4 affordable. There needs to be a consistent project description, both for the number of units and for off-site improvements. This is very critical as the project does not comply with standards for Fire Management Zones (FMZ) and is proposing alternative mitigation. Without a clear description of the amount and location of the compromised FMZs it is not possible to determine that this proposed mitigation is sufficient. Figure 3 text says the FMZ Zone 1 Irrigated area is 0-30' wide. The figure shows no area of 0 width. FMZ 2 Non-irrigated text says it is 30-70' but the Figure shows lots of areas that appear to be less than 30' wide. Furthermore section 4.18 Wildfire discusses a FMZ of 0-5' from building foundation, with very specific restrictions on that zone. Those include irrigation and limited plant use and plant height from 6 -18". That zone is not mentioned in App O, shown on Figures that describe the FMZs, nor is it found on the landscaping plan. Please provide a consistent description of all of the FMZ requirements including this 0 - 5 ' zone, include on the related figures, and include provisions for enforcement. We are not aware of HOA's or OFD having inspection programs that review the 5' perimeter around residential buildings for fire compliance.

02-129 Cont.

- **App O Page 14 section on Water Supply missing the end of the sentence.**

02-130

- **Includes equestrian provisions that have been eliminated from project description**
  Page 14 of App O says a "full width cul-de-sac bulb will be constructed at the northern end of the access road to accommodate horse trailers ." and later "... will provide all weather access to the community equestrian areas and public water and sewer utility area." It is not clear that this is actually shown on Figure 2, but it clearly is not consistent with the rest of the project description that has waived all Equestrian Overlay District conditions.

02-131

- **Areas that require parking restrictions are not shown on Figure 2**
  Page 15 of App O talks about space for horse trailer parking, but this seems inconsistent with requirements for Fire Department turnaround. Also, the project description discussion of parking does not identify parking for visitors, deliveries, etc. Parking restricted areas should be identified on Figure 2. The project description needs to indicate the number and location of parking spaces provided, not just the 2 car garage for each residence.

02-132

- **Insufficient analysis and mitigation for failure to meet City of Oceanside Level 1 fire response time of 90% within 5 minutes**
  Page 19 and continuing describes the anticipated response times. Table 1 on page 20 shows expected response times for each of the three closest fire stations. On page 21 it says "The final decision regarding the need to mitigate for not strictly complying with the Oceanside Fire Departments time would be at Oceanside Fire Department Discretion." Per the CEQA process this is at the discretion of the City Council as the lead agency and should be done as part of the public process and not administratively, after the fact with no public awareness.

02-133

- **Failure to support adequacy of the proposed mitigation for violation of FMZ width**
  The proposed mitigation seems primarily the requirement for double paned windows on the homes along the "northern, western and eastern boundaries. Double paned windows are already required for all SFR's by the Building Code so this is not mitigation. And of course, windows only work to restrict embers entering the house if they are closed and there is no assurance that will occur 100% of the time during a fire situation. In other places it talks about the widening of Guajome Lake Rd., additional fire hydrants and limited number of new residents and vehicles as justification for the reduced width of FMZ's. There is nothing that justifies that these measures are sufficient to reduce this risk to an acceptable level. Furthermore, this has not been properly treated as a formal mitigation for project impacts. Without acceptable mitigation the project fails to meet fire safety standards for FMZs so whatever is proposed as mitigation needs to be specified as a formal project Mitigation Measure with accountability for construction and enforcement for the life of the project. Furthermore page 23 states FMZs are "arguably more important when situated adjacent to older structures." The FMZ width reduction does not just impact the project, it potentially impacts the other adjacent properties, which include older homes, and Guajome Regional Park. The DEIR has failed to consider any additional potential impacts to adjacent properties.

O2-134

- **false conclusion that it is "not possible to achieve full 100' FMZ width"**
  This conclusion on page 39 is not accurate. Of course they could include the full width for the FMZs, but it would substantially reduce the developable area of the site.

O2-135

- **Issues with Appendix D Prohibited Plants List**
  It appears that Appendix D is missing two species that have been specifically restricted from being planted in Oceanside— tamarisk and pampas grass. These (along with *Arundo donax* that is included) were restricted several years ago following a series of arson fires in the San Luis Rey River bed. There are also several native plant species that are present (or could become present) in the land that is set aside for preservation. This should clarify that such existing native plants in the preserve area are not restricted.

O2-136

- **Failed to consider impacts of roadway plan on emergency evacuation**
  The DEIR concludes that because the project has two access driveways and that Guajome Lake Rd is being improved this will be sufficient for evacuation. However, these two driveways are within about 200 ' of each other and both access to the same road, Guajome Lake Rd. In addition, there are several roads in the project vicinity that also have a single road in and out- and that single road is Guajome Lake Rd. According to the Transportation analysis 50% of the project traffic will exit to the east and 50% to the west. During evacuations it is common for an evacuation route to be limited to a single direction, away from the fire and to avoid conflicts with responding emergency vehicles. This roadway condition with so many one way in and out roads could result in increased evacuation times. This is a particular concern in areas where animals may need to be evacuated as that also adds to the evacuation time.

O2-137

We believe an evacuation time study should be done to ensure there can be safe evacuation considering these roadway design limitations and the need to evacuate animals. Also the county of San Diego has recently adopted standards for evacuation in areas with animals that should also be incorporated.

O2-137 Cont.

Parks

- **Incorrectly includes protected habitat as part of the recreational amenities**
  Page 4.13-1 says "residents of the project would have access to the 6.92 acres of common open space." That number of acres includes the protected on site natural habitat for which there is no recreational access identified. If recreational access is allowed into that habitat area, then this would result in additional impacts to biological resources that have not been evaluated.

O2-138

Recreation

- **Inaccurate statement about parks maintained by the city**
  Page 4.14-1 says the city maintains a list of parks that include Calaveras Lake and Hosp Grove in Carlsbad, and Guajome Regional Park. The city of Oceanside does not maintain these three parks.

O2-139

- **The analysis concludes that the park standard of 5 acres/1,000 residents will be met by the future El Corazon park**
  There are no assurances as to when, if ever, the park acres included on ELC will ever be built. The first of 9 proposed parks on ELC was recently delayed for an unknown period of time when cost estimates more than doubled and there are insufficient funds available for construction. No funds have been committed to any of the other future parks on ELC. The city does not have a valid plan to address the existing shortfall in park acres and this project will further exacerbate that shortfall.

O2-140

- **There is no discussion of the impacts of the project on the recreational value of Guajome Regional Park**
  The park is described as 75 acres with 4.5 miles of trails, diverse habitat, playgrounds, basketball court and 33 campsites. The DEIR says that 420 feet of Guajome Lake Rd will be widened and improved within the park. There is no analysis of the direct impacts of this road widening although there is a parallel trail within the park that will now be closer to an improved road with increased traffic. The project would impact views from the trails and other areas of the park, and add noise and air pollution. There is no discussion about how eliminating compliance with the EOD for this project right along the park could impact equestrian access to the park, including from several horse properties on the north side of

O2-141

Guajome Lake Rd who will now need to cross this wider road with heavier traffic to access the trails within the park.

O2-141 Cont.

Population/Housing

➢ **Table 6-1 fails to identify numerous projects using density bonus to exceed the allowed density in the General Plan**

There are a large number of projects already approved or in the pipeline that have used the density bonus law to exceed the number of housing units that are allowed in the General Plan. Furthermore, every discussion of housing in the DEIR uses the gross RHNA number for the current 8 year housing cycle and fails to show details by income level, and actual progress toward achieving those goals. A key impact is that overbuilding of above moderate housing has a disproportionate impact as these units are larger, have more vehicles and create more GHG. Attachment C to this comment letter shows the most recent SANDAG dashboard of housing for the city of Oceanside. At this rate the city is on track to exceed the above moderate housing units in a few years as it has already achieved 42.5 % in the first two years of the eight year cycle. At that pace it will achieve 180% of the total in the eight-year cycle. Oceanside, like most cities in this region, still fails to meet the need for very low income and low- income housing while continuing to build more above moderate units than are needed.

O2-142

Other CEQA Considerations

➢ **Project is growth-inducing**

Once a non-equestrian project is allowed in this low density equestrian area it will start the dominoes falling—with more such projects to follow. The special overlay districts for the park and equestrian use were approved in 1992. It is clear from the slow rate of change in this area that they have helped protect its unique character. This developer is already under contract to purchase another nearby property (See Att D) . One can anticipate he will follow the same model he used with this project resulting in more pressure to develop this area with high density housing.

O2-143

Improving at least part of Guajome Lake Rd and extending the sewer system will make it that much easier for the next project to increase the density and change the character of this area. These cumulative impacts all have long term cost implications for the taxpayers of Oceanside and continued adverse impacts on this neighborhood and are growth inducing.

O2-144

Alternatives Analysis

We very much appreciate that the DEIR has identified an environmentally superior alternative that is both feasible and actually substantially reduces the adverse impacts of the proposed project. But further analysis of impacts and mitigation is needed because of the changes proposed with this alternative. It is proposing similar waivers as the existing project— which results in substantial potential impacts as discussed in these comments.

O2-145

The change in land use to multi-family residential will require a General Plan Amendment and numerous other changes. That change in land use would require VMT analysis because the project will produce over 500 ADT. It does not appear that this analysis has been done for this alternative. Also the ECAE Policy 21-2 says the City shall explore incentives for EV charging facilities in multi-family developments. CAP compliance would need to be re-evaluated.

Thank you for considering our comments.

Sincerely,

Diane Nygaard, President
On Behalf of Preserve Calavera

Attachments:
A MHCP/C SAP Edge Effect Conditions
B Chatten Brown Carstens Letter on Failure to Implement the CAP
C San Diego County RHNA Dashboard for Oceanside
D Description of Nearby Property Under Contract for Purchase
E HCD letter Allowing Justification For Use of Waivers

O2-146

Attachment A: MHCP/C SAP Edge Effect Conditions

City of Oceanside – Standard Project Conditions

SELECT AS APPROPRIATE - FOR PROJECTS LOCATED ADJACENT TO RESERVE AREAS OR WITH OTHERWISE SENSITIVE HABITAT ISSUES

1. A qualified biologist shall be retained by the applicant to review the final grading plans, access routes and staging areas, monitor all aspects of construction, educate contractors about the biological sensitivities associated with the area and ensure compliance with mitigation measures.
2. The qualified biologist shall conduct a training session for all project personnel prior to any grading/construction activities. At a minimum the training shall include a description of the target species of concern, its habitats, the general provisions of the Endangered Species Act (Act) and the MHCP, the need to adhere to the provision of the Act and the MHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the target species of concern as they relate to the project, any provisions for wildlife movement, and the access routes to and project site boundaries within which the project activities must be accomplished.
3. A water pollution and erosion control plan shall be developed that describes sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices and other factors as deemed necessary. Erosion control measures shall be monitored on a regularly scheduled basis, particularly during time or rainfall. Corrective measures shall be implemented in the event erosion control strategies are inadequate. Sediment/erosion control measures shall be continued at the project site until such time as the revegetation efforts are successful at soil stabilization.
4. The footprint of habitat disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
5. The upstream and downstream limits of project disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.
6. Placement of equipment and personnel within environmentally sensitive habitat areas stream channels or on sand and gravel bars, banks and adjacent upland habitats used by target species of concern shall be avoided. Activities that can not be conducted without

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placing equipment or personnel in sensitive habitats shall be timed to avoid the breeding season of the target species of concern.

7. When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing or other sediment trapping materials shall be installed at the downstream end of the construction activity to minimize the transport of sediments off-site. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from re-entering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.
8. Equipment storage, fueling and staging areas shall be located to minimize risks of direct drainage into riparian areas or other environmentally sensitive habitats. These designated areas shall be located in such a manner as to prevent runoff from entering sensitive habitats. All necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. All project related spills of hazardous materials shall be reported to appropriate entities including but not limited to the City of Oceanside, FWS, and CDFG, SWQCB and shall be cleaned up immediately and contaminated sails removed to approved disposal areas.
9. Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.
10. Stockpiling of materials and other aspects of construction staging shall be limited to disturbed areas without native vegetation, areas to be impacted by project development or in non sensitive habitats.
11. "No-fueling zones" shall be established within a minimum of 10 meters (33 feet) from all drainages and fire sensitive areas.
12. Scheduling of construction activities shall minimize potential impacts to biological resources. Construction adjacent to drainages shall occur during periods of minimum flow (i.e. summer through first rain of fall) to avoid excessive sedimentation and erosion and to avoid impacts to drainage dependent species. Construction near riparian

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areas or other sensitive habitats shall be scheduled to avoid the breeding season (March through September) and potential impacts to breeding bird species.

13. Construction activities during the breeding season (dates tbd depending upon species of concern- some start in Feb March through September) shall be limited to those that will not produce significant noise impacts (i.e. noise levels greater than 60 dBLeq –decibels equivalent sound level) at the edge of the habitat of concern.
14. Conduct preconstruction surveys at potential impact areas between mid-May and mid-June.
15. Human and pet access to preserve areas shall be limited to designated trails by use of natural vegetation, topography, signs and limited fencing.
16. Artificial lighting adjacent to the preserve area shall be eliminated except where essential for roadway, facility use and safety and security purposes. Where use of artificial lighting is necessary it shall be limited to low-pressure sodium sources. Use of low voltage outdoor or trail lighting, spotlights or bug lights is prohibited. All light sources shall be shielded so that lighting is focused downward to restrict any light spillover onto sensitive habitat.
17. The HOA shall establish an education program for homeowners regarding responsible pet ownership. The program shall encourage a) keeping pets indoors, especially at night; b)having pets neutered or spayed to reduce unwanted reproduction and long-range wandering; c)belling of cats to reduce their effectiveness as predators; d) prohibiting release of unwanted pets into the wild; e) keeping dogs on leashes when walking them on trails in preserve areas.
18. The HOA shall establish a feral animal removal program.
19. The qualified biologist shall monitor construction activities throughout the duration of the project to ensure that all practicable measures are being employed to avoid incidental disturbance of habitat and any target species of concern outside the project footprint. Construction monitoring reports shall be completed and provided to the City of Oceanside, FWS and CDFG summarizing how the project is in compliance with applicable conditions. The project biologist shall be empowered to halt work activity if

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necessary and to confer with staff from the City of Oceanside, FWS and CDFG to ensure the proper implementation of species and habitat protection measures.

20. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species. Al revegetation plans shall be prepared and implemented consistent with Appendix C (Revegetation Guidelines of the Final MHCP Plan – Volume II) and shall require written concurrence of the FWS and CDFG.

21. To avoid attracting predators of the target species of concern, the project site shall be kept clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site. Pets of project personnel shall not be allowed on site where they may come in contact with any listed species.

22. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits shall be fenced with orange snow screen. Exclusion fencing shall be maintained until the completion the completion of all construction activities. All employees shall be instructed that their activities are restricted to the construction areas.

23. Any habitat destroyed that is not in the identified project footprint shall be disclosed immediately to the City of Oceanside, FWS and CDFG and shall be compensated at a minimum ratio of 5:1.

24. If dead or injured listed species are located, initial notification must be made within three working days, in writing to the Service's Division of Law Enforcement in Torrance California and by telephone and in writing to the applicable jurisdiction, Carlsbad Field Office of the FWS, and CDFG.

25. The City of Oceanside shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project conditions and BMPs. The FWS and CDFG may accompany the City representatives on this inspection.

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Cont.

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26. Any planting stock to be brought onto the site for landscaping or ecological restoration shall be first inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants, fire ants, and other insect pests. Any planting sock found to be infested with such pests shall not be allowed on the project site or within 300 ft of natural habitats. The stock shall be quarantined, treated or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats.

27. New utility lines or towers or modification of existing utility lines or towers shall implement designs that preclude or minimize harm to wildlife due to collisions or electrocution. Information on such designs is available at www.migratorybirds.fws.gov/issues/towers.

28. Use bridges, instead of culverts for all major riparian crossings and regional wildlife movement corridors. The site of the riparian crossing and its importance as a wildlife corridor should dictate the design. (Where appropriate based on site specific survey results) Wildlife undercrossings shall be designed and implemented (for new roads or road improvement projects that could disrupt wildlife movements or result in increased road kill). Such undercrossings, along with any necessary wildlife fencing or other facilities, shall be designed based on best available information to maximize use of the undercrossing by species of concern. Undercrossing design shall strive to maximize the openness index (widthXheight/length), minimize traffic noise within the crossing, use skylight openings within the underpass to allow for vegetative cover within the underpass, use appropriate fencing to funnel wildlife into the crossing rather than across the road surface, and screen the undercrossing opening and access path with natural vegetation. Undercrossing design shall be subject to review and approval by the City of Oceanside, FWS and CDFG prior to issuance of grading permits.

29. All mitigation sites shall be conserved through fee title acquisition or conservation easement, and proof of recordation shall be provided to the City of Oceanside prior to land disturbance.

30. Use of retaining walls shall be minimized. Development on the site shall be configured to existing topography to minimize grading and landform alteration.

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Cont.

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31. Existing natural drainages and watersheds shall be maintained. The project shall restore or minimize changes to natural hydrological processes.

32. Detention basins shall incorporate earthen berms to allow growth of natural vegetation.

Note : There are additional specific conditions in areas of equestrian use

CONDITIONS SPECIFIC TO BUENA VISTA LAGOON

33. The Buena Vista Lagoon boundary (and/or wetland area) shall be delineated and criteria used to identify any wetlands existing on site shall be those of Section 30121 of the Coastal Act. Mapping of wetlands, conditions to protect sensitive resources and siting of development shall be done in consultation and subject to approval of DFG.

34. Landscaping on the site shall be utilized as a visual buffer and shall be compatible with the surrounding native vegetation and preserved open space through installation of native, non-invasive, drought tolerant plant species.

35. Approved landscaping shall be installed immediately upon completion of construction and maintained by the property owner in good growing condition for the life of the development.

36. Landscaping screening of structures with specimen trees and fire-retardant vegetation of substantial height, shall be required to screen and soften the view of structures from _____(Interstate 5/ Buena Vista Lagoon etc.) and public vista points.

37. A HOA shall implement a landscape management plan that includes herbicide/pesticide management and removal of invasive species..

38. On-site sensitive biological resources areas inclusive of the 100-ft buffer area shall be left in their natural state (or restored with native drought tolerant vegetation) and used only for those passive activities allowed as a condition of permit approval. The permissible passive activities and any other conditions of the permit shall be incorporated into a covenant of easement that shall be recorded against title to the property. The USFWS and DFG shall be named beneficiaries to any covenant of easement recorded pursuant to this condition.

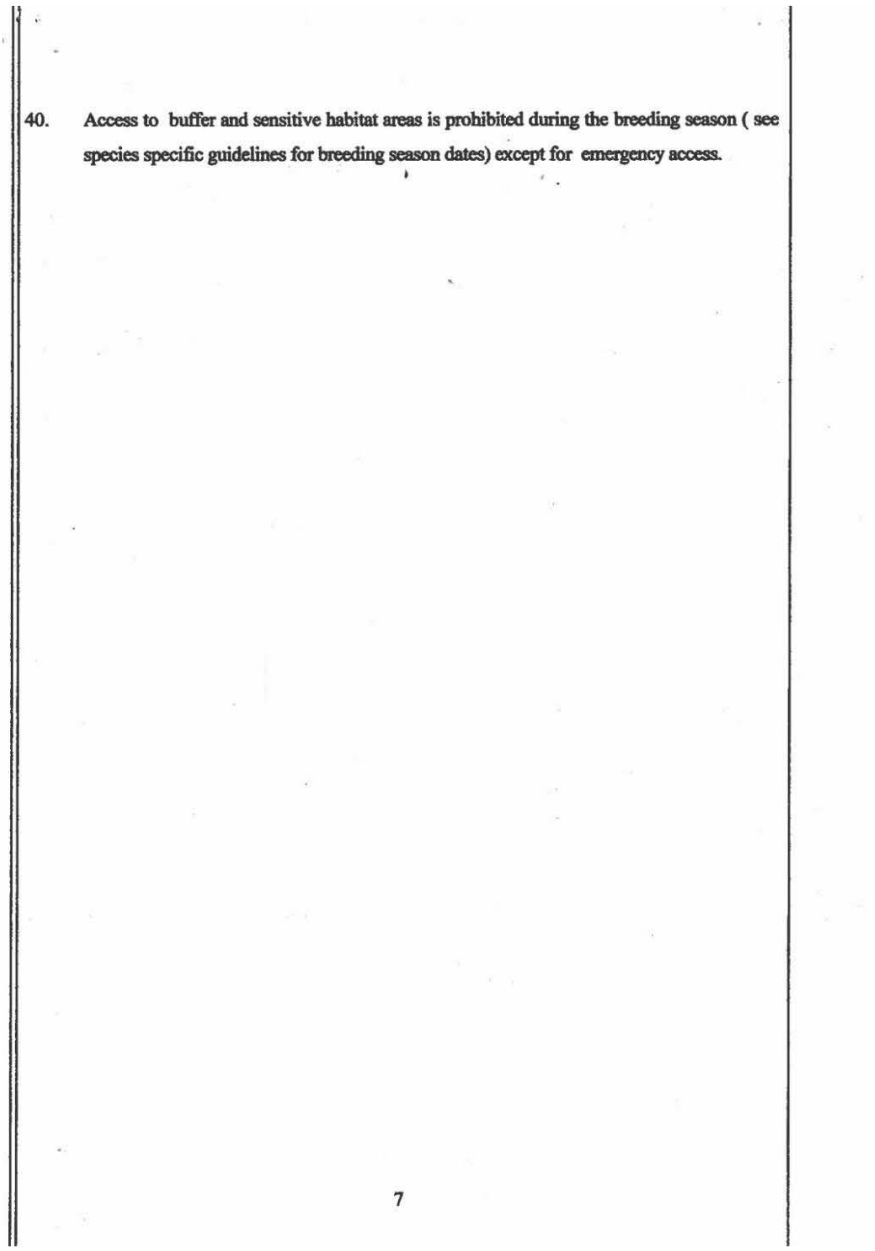
39. The use of chemical pesticides for mosquito control is prohibited (rely on biological agents).

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40. Access to buffer and sensitive habitat areas is prohibited during the breeding season (see species specific guidelines for breeding season dates) except for emergency access.

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Cont.

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Attachment B: Chatten Brown Carstens Letter on Failure to Implement the CAP

Chatten-Brown Law Group, APC
Kathryn Pettit | Associate
325 W. Washington Street, Suite 2193
San Diego, CA 92103
kmp@chattenbrownlawgroup.com
Phone: (619) 393-1440

December 22, 2023

Via email

City of Oceanside City Manager
Jonathan Borrego

Re: The City of Oceanside's Failure to Implement its Climate Action Plan and Necessary Remedial Actions

Dear Mr. Borrego:

Our firm represents Preserve Calavera in relation to the City of Oceanside's Climate Action Plan. The mission of Preserve Calavera is to protect, enhance, and restore the natural resources of Coastal North San Diego County, which includes addressing and minimizing the growing impacts of climate change. As the world's leading experts on climate change have underscored:

> Climate change is a primary driver of biodiversity loss. And climate change depends on biodiversity as part of the solution. So clearly, the two are linked and cannot be separated.

(Elizabeth Mrema, Executive Secretary, United Nations Convention on Biological Diversity, May 2022.)[1]

As the harmful and costly impacts from climate change increase, swift and meaningful climate action from local governments becomes more and more imperative.[2] Yet, the City of Oceanside ("City") is failing to achieve several specified measures, strategies, and targets that are required under its Climate Action Plan ("CAP"). It is further failing to comply with the CAP's implementation and monitoring requirements.

At the outset, Preserve Calavera would like to make clear that its paramount goal is successful implementation of the CAP, and to achieve further reductions in greenhouse gas ("GHG") emissions in the City to ensure alliance with the State's climate mandates. At this stage, the purpose of this letter is not to initiate litigation, but to spur collaboration. Preserve Calavera aims to underscore the gravity of the CAP's shortcomings, propose solutions, and begin a cooperative process moving forward.

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[1] https://www.un.org/en/climatechange/science/climate-issues/biodiversity
[2] https://www.nature.com/articles/d41586-023-03849-y [Climate change has placed the world in danger of breaching numerous planetary 'tipping points']; https://www.noaa.gov/news-release/climate-change-impacts-are-increasing-for-americans [Climate change impacts are increasing for Americans];

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Preserve Calavera is committed to help reduce GHG emissions in Oceanside, and has secured funding to support local GHG-reducing projects. Preserve Calavera seeks to work together with the City to ensure timely and urgent implementation of the CAP, as well as additional local GHG reduction projects, to which Preserve Calavera can contribute funding.

I. Overview

Preserve Calavera urges the City to implement and adhere to its CAP. Unfortunately, as described throughout this letter, the City is falling woefully short of its promised strategies, timelines, monitoring, and implementation actions.

The City's own staff alerted City Council to several of these failures last year, including the lack of adequate staffing and funding. Yet, the City failed to take any meaningful action. Preserve Calavera has also notified the City of its failures to implement the CAP on several occasions. Meanwhile, the City continues to take advantage of the CAP's streamlining benefits and approve projects without individual-level GHG analysis and mitigation. We detail several examples of the City's failure to implement its CAP in **Section II**.

These failures result in ongoing violations of CEQA. First, the CAP is both an element of the City's General Plan and a mitigation measure for all development under the General Plan. Thus, it must be implemented and enforced, as detailed in **Section III**.

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Cont.

Additionally, the City continues to rely on the CAP as a GHG streamlining plan. CEQA Guidelines Section 15183.5 establishes the criteria for "Tiering and Streamlining the Analysis of Greenhouse Gas Emissions." The CAP fails to meet these criteria, and cannot be relied on for GHG analysis and mitigation for individual project CEQA review until the City's deficient implementation is corrected, as detailed in **Section IV**.

Finally, we see that the City is in the process of updating its General Plan, which may include an update to its CAP. The City must promptly update the CAP to remedy the deficiencies identified throughout this letter, especially in light of the history of inadequate and incomplete implementation. Preserve Calavera provides several recommendations in **Section V**.

Preserve Calavera appreciates the staff members who have worked on the CAP and its implementation. However, the City has failed to supply the funding, resources, time, and personnel to implement and monitor the CAP. This must change.

II. The City Is Failing to Implement its CAP

The City is failing to meet several of the CAP's specified strategies, timelines, and targets, as well as its required monitoring, reporting and adaptive management standards. Climate Action Campaign gave Oceanside a score of 53.5/100 for the City's CAP implementation.[3] Further, the City's 2022 Climate Action Plan Implementation Progress Report ("Progress Report") demonstrated concerning deficiencies in the City's progress with CAP implementation, and revealed there is little monitoring being conducted.

a. Failure to Implement the CAP's Overarching Requirements, Including to Conduct Monitoring and Update the GHG Inventory

The CAP requires annual monitoring and reporting to track implementation progress and update the City's GHG inventory and forecasts. The CAP explicitly states: "The City will be responsible for developing protocol for monitoring the effectiveness of emissions reduction programs as well as for undertaking emissions inventory updates." (CAP, p. 4-22, see also "City will keep track of reduction measures implemented and schedule milestones identified in the CAP, including progress reports on the reduction measures, funding, and savings.")

As an initial matter, the City did not even publish its first required "annual" report until August 2022, despite approving the CAP three years earlier in August 2019. (Ibid. ["the City will report annually to the City Council on CAP implementation progress, activity indicators, and relevant changes in State measures"].)

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Further, the 2022 Progress Report admitted that "the City has not consistently reported CAP progress." It attributed this lack of consistent reporting to "staffing challenges," yet said little about how the City plans to correct itself besides its vague assertion that "steps are being taken to develop a more consistent reporting system." (Progress Report, **Exhibit A**, p. 1.) We were unable to locate a 2023 Annual Progress Report.

Relatedly, the CAP had proposed an interdisciplinary Climate Action Planning Team and anticipated the establishment of a CAP Stakeholder Committee. (CAP, p. 4-1.) Yet, the City has only hired a "part time professional assistant" to coordinate CAP implementation." (Progress Report, p. 2.) The Progress Report admitted, "staff finds that additional staffing and/or funding resources **are needed** to effectively implement, monitor, and report on several of the emissions reduction measures. It is recommended that the City consider funding for a full-time

[3] 2022 Climate Action Plan Report Card, p. 10 (available at: https://www.climateactioncampaign.org/_files/ugd/91c4c2_db55421e0abd475aa467110ede7c298e.pdf?index=true)

sustainability coordinator…" (p. 12.) Further, "staff in responsible departments **indicated a lack of capacity for CAP implementation**." (Id. at p. 3, emphasis added.)

In March 2020, members of the public raised concerns to the City that it was not devoting enough resources to CAP implementation, and that it needed to ensure adequate staffing.[4] These concerns went ignored.

The 2022 Progress Report still failed to provide direction or concrete steps to address the deficiencies raised in the Progress Report, especially in regard to the current lack of adequate staffing, funding, and monitoring. In contrast, the cities of San Diego, Chula Vista, Carlsbad, Encinitas, and Del Mar maintain full-time staff dedicated to CAP implementation.

These overarching failures indicate a lack of priority to CAP implementation and erode confidence that the CAP is meeting its promised targets and GHG reductions.

Finally, the CAP states: "The City will comprehensively update its 2020 GHG inventory to evaluate progress toward meeting its GHG reduction goals . . . **Moving beyond 2020**, the City will comprehensively update its GHG inventory **every five years**." (p. 4-22, emphasis added.) Yet, the Progress Report simply states, "An updated inventory will be prepared in conjunction with the next CAP update." (p. 16.)

The City was required to prepare an updated inventory in 2020, and then again in 2025. Thus, it is imperative that the City prepares an updated inventory promptly. The City cannot wait multiple years to conduct this analysis – this must be initiated now, and completed as soon as possible.

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We request a response from the City about when it plans to publish the next progress report, when it plans to update the GHG inventory, and what remedial actions it has taken since the 2022 Progress Report to address the deficiencies identified therein.

b. Failure to Implement the CAP's Specific Measures

We also documented several specific examples of the City's failures to implement measures that were identified in the CAP. Of the CAP's strategies, the majority have seen little to no progress since CAP adoption. In **Exhibit B**, we highlighted in red all strategies that have not completed the required actions by the CAP's specified deadlines, have seen no substantive progress, and/or

[4] Summary of Public Comment Received at Open House, March 3, 2020 (available at: https://records.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?blobid=53000.)

are now considered infeasible. We highlighted in orange all strategies that fail to provide additional GHG reductions.[5]

A review of the individual strategies that were promised in the CAP, and what has been accomplished to date, is disconcerting. Only a fraction of the CAP has actually been implemented, and the City has failed to meet several timelines and targets. We detail some of these shortcomings in depth below.

i. Renewable Energy Procurement

The CAP assigned its highest reduction potential – 73,685 MT CO2E by 2030 – to Renewable Energy Procurement (Measure E-1). (CAP, p. 4-7.) In fact, this measure accounts for **over 48%** of the CAP reductions.

The Progress Report claims this measure is "Mostly Implemented." (p. 23.) Yet, a review of the individual strategies indicates otherwise. One of the CAP's four strategies to implement Measure-E1 requires the City to "Promote Participation in SDG&E EcoChoice and Ecoshare Programs." The Progress Report claims this strategy is "In Progress." Yet, the Progress Report later admits that "SDG&E is **discontinuing** EcoChoice and EcoShare has presented **extensive barriers** to entry for prospective subscribers." The other strategy also centered on receiving reports on SDG&E Procurement and Program Participation, which is also claimed as "In Progress." Thus, these strategies are failing.

O2-147
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While we are encouraged by the City's direction to join the Clean Energy Alliance, in line with the third strategy, the City has not provided any evidence or data to show the CAP will achieve the promised reductions for Measure E-1.

Thus, we request the City demonstrate that it is meeting the CAP's target for Measure E-1 to "procure 75 percent of local energy from renewable sources by 2030 and thereby exceed California RPS mandates." (CAP, p. 3-3.)

ii. Solar Photovoltaic Promotion Program

The CAP's second highest anticipated GHG reductions reportedly come from its Solar Photovoltaic Promotion Program (Measure E-2), which the Progress Report claims is "Mostly Implemented." Measure E-2 lists four strategies for its implementation, but only half have been completed.

[5] Meaning, the strategies do not cause GHG reductions that would have not otherwise occurred without the CAP.

The Progress Report claimed two of these strategies are "In Progress." Yet, very little progress has occurred for both. For the "Promote Solar Financing Options" Strategy, the Progress Report simply states, "The City has outreach content in development." For the "Establish an Aggregated Demand Solar PV Program" strategy, the City is only "in the process of gauging interest," and exploring the "potential legal implications of partnering with private industry on such a program." (Progress Report, p. 26.) Both of these strategies not only failed to meet the CAP's prescribed timelines, but they are far behind meeting the CAP's timelines. (CAP, p. 4-10.)

While the City adopted a solar ordinance in 2019, much of its mandates are already required by the State Building Code. The CAP notes, in a footnote, "the Energy Code will require that new residential projects incorporate renewable energy beginning January 1, 2020. The residential-component of the Ordinance will achieve GHG emission reductions by enforcing renewable energy requirements beginning at an earlier date." Yet, the ordinance was only adopted a few months earlier. Similarly, the final strategy only requires the City to "maintain" expedited permitting for Residential Solar PV Systems. Thus, these two strategies provide very little additionality.

Further, the City has not provided any monitoring data demonstrating it is meeting the CAP's reduction target of 50 percent forecasted energy demand. (CAP, p. 4-9). The only energy efficiency data provided in the 2022 Progress Report is a snapshot from 2018. There appears to be no monitoring or reporting beyond the adoption of the ordinance. This is a common theme across the board, and conflicts with CAP standards for monitoring implementation of reduction measures. (See CAP, p. 4-22.)

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Thus, out of the four strategies, two have seen no progress, one requires nothing additional of the City, and the final strategy has not been monitored at all.

iii. Energy Promotion Measures

The CAP Measures E-3, E-4, and E-5 all centered on "promotion" of voluntary programs to City residents, which demands very little financial resources of the City. Yet, the City has not made progress on these measures.

Residential Energy Conservation and Disclosure (Measure E-3) included two strategies. For Strategy #1, "Promote Residential Energy Use Disclosure," the Progress Report states the "[t]he City is awaiting information from SDG&E *on the future of* the Home Energy Use Benchmarking Program." For Strategy #2, "Promote Energy Efficiency Improvement Financing Options," the Progress Report stated that "*Upon development of a program*, information, or resources by Development Services, the Water Utilities Green Oceanside program *will promote* through their outreach and education campaigns."

Thus, both of these strategies have seen no progress, and both fall behind the CAP's timelines and targets. (CAP, p. 4-10.)

For "Promotion of Low-Income Financing Programs" (Measure E-4), there was only one strategy: "Promote Low-Income Financing Options." The Status Report states this is "In Progress," but a closer look reveals this strategy has little chance of being implemented. The Progress Report states that "[t]he City began researching programs such as the California Solar Initiative. SASH, MASH, and LIWP. All programs previously outlined in the CAP have either sunset, run out of funding, or doesn't [sic] apply to Oceanside as the City is not considered a Disadvantaged Community." (Progress Report, p. 21.)

For "Non-Residential Building Energy Benchmarking and Disclosure" (Measure E-5), there was only one strategy, "Promote Non-Residential Energy Use Disclosure," which also has not been started. "The City **will begin** the planning process and meet with relevant staff to develop an outreach plan." (Progress Report, p. 21.)

iv. Transportation Measures

Transportation emissions account for 48% of Oceanside's GHG inventory. The CAP included a measure for Transportation Demand Management ("TDM") Plans (Measure TL-5), premised on three strategies. The CAP required adoption of a TDM ordinance as Strategy #1, which the City adopted in 2020.

While the ordinance is a step in the right direction, if it is not enforced and monitored, its adoption is ultimately meaningless. When Preserve Calavera submitted a Public Records Act request earlier this year for copies of TDMs and related monitoring reports, the City only produced one TDM plan from 2021. Further, the City did not produce any monitoring reports – just this one initial TDM plan. (**Exhibit C**, City Response to Preserve Calavera PRA Request.) This indicates a lack of monitoring and enforcement of the ordinance, and undermines the CAP's claimed "moderate" GHG reductions for this measure. The CAP's projected GHG reductions relied on an assumed 10% milage reduction in commuter trip miles through this ordinance. Yet, the TDM ordinance itself, as well as the lackluster implementation and monitoring, fail to demonstrate anything close to a 10% trip mile reduction.

Further, the City has failed to implement the CAP's remaining TDM strategies. Strategy #2 required the following: "Conduct surveys of business to determine existing TDM measure implementation rates. Require businesses complete survey during business license renewal. Provide rebates for implementation of TDM measures such as addition of bicycle parking or transit stop shelter improvements." (CAP p. 3-32.)

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The City was supposed to complete these requirements by now. (CAP, p. 4-16.) In particular, the CAP required the City to develop the survey within a year of CAP adoption, and then administer the survey to 25% of existing businesses within one year, and to 100% of businesses within 4 years of CAP adoption. (CAP, p. 4-16). Yet, according to the 2022 Progress Report, "The City is in the process of **generating** the content of a TDM survey and will aim to disperse the materials to the business community in September of 2022." (Progress Report, p. 28, emphasis added.) The Progress Report is silent on the other elements.

Finally, the Progress Report admits it lacks funding to complete the third strategy to "[p]rovide incentives and marketing promotion through Green Oceanside Business Network for businesses that incorporate TDM measures." (Progress Report, p. 28.) In contrast, the CAP promised that the City would "Use Survey Results to Identify TDM Opportunities Within 18 months of CAP Adoption," and then "Provide Incentives as Appropriate for Infrastructure Improvements to Support Alternative Modes of Transit Within 2 years of CAP Adoption." Four years have passed since CAP adoption.

The City must dedicate resources and fundings to its CAP measures. It cannot raise its hands in the air for lack of funding, while failing to provide any solutions. At a minimum, if it cannot identify funding to implement its CAP, it must then cease to utilize the CAP for CEQA streamlining.

v. Electric Vehicle Promotion

The CAP reported moderate reduction potential for "Electric Vehicle Promotion" (Measure TL-2), which was reported as "Mostly Implemented." One of the strategies requires the City to "collaborate with local EV retailers to establish an Aggregated Demand EV Program." (CAP, p. 3-5.) According to the 2022 Progress Report, this measure is "in progress and facing obstacles," and is ultimately considered infeasible "due to the current lack of availability in the EV market." (Progress Report, p. 25.)

Another strategy, "Promote Incentives for EVs and EV Charging Stations" was reported as "In Progress," on the grounds that "The City provides expedited permitting for EV charging stations through our Checklist For Permitting Electric Vehicles and Electric Vehicle Service Equipment." (Progress Report, p. 25.) Yet, in contrast, the CAP had required a host of actions for promotion beyond a Permit Checklist that were omitted from the Progress Report:[6]

[6] Similarly, the Progress Report omits strategies for Measure TL-4, including to "Require new developments to provide connections and/or extensions of the bicycle and pedestrian networks where applicable." (CAP, p. 3-30.)

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- Promote incentives for purchase of ZEVs such as available federal tax credits (up to $7,500) and available rebates offered through the California Clean Vehicle Rebate Project (up to $2,500).
- Provide permit fee waivers for construction related solely to the installation of EV charging station circuitry such as electrical rewire permitting, electrical service upgrade permitting, or other miscellaneous permitting that is typically charged at an hourly rate.
- Allow by-right sale of ZEV vehicles within all retail-oriented commercial zones.
- Incentivize installation of direct current fast charging stations at gas stations and other retail.
- Establish public-private partnerships to increase charging infrastructure at existing office and industrial facilities.
- Promote commercial businesses and industry that provides EV charging stations and incentives for EV use to employees through added marketing and benefits from City's Green Oceanside Business Network program.

(CAP, p. 3-27 to 3-28.)

Further, the CAP required several of these actions to be accomplished by now. (CAP, p. 4-14.) Beside adoption of Zoning Ordinance 3048 in 2020, the City has not made any progress on Measure TL-2, and has failed to meet the majority of deadlines and timelines specified in the CAP.

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vi. Water, Wastewater, and Solid Waste Measures

The City has also failed to implement the CAP's additional measures related to waste and wastewater. Of the CAP's three measures, the first measure simply requires the City to continue to "Implement its Water Conservation Master Plan" (Measure W-1), which predated the CAP. Thus, this measure does not provide any additional GHG reductions. Nor does the Progress Report provide any monitoring data.

The second measure, "Non-Residential Water Use Benchmarking and Disclosure" (Measure W-2), only requires one strategy – "Promote Non-Residential Water Use Disclosure." Yet, the Progress Report admits the City has not even started any promotion, as "The City is researching what programs are available…" (Progress Report, p. 22.)

Finally, the third measure, "Increased Local Water Supply" (Measure W-3) is "In progress and facing obstacles" and "needs to be updated." (Progress Report, p. 22.) In contrast, the CAP had promised the following strategy: "Identify and implement capital improvements to the San Luis Rey Water Reclamation Facility that increase the supply capacity of recycled water that meets Title 22 requirements for unrestricted use to at least 3.0 million gallons per day by 2025; 5.5

million gallons per day by 2035, and 7.5 million gallons by 2045." (p. 3-16.) Notably, Measure W-3 anticipated 2,102 MT in reductions by 2025.

To address solid waste emissions, the CAP established two measures. The first measure was "Implementation of Zero Waste Strategic Resource Plan" (Measure SW-1), which the City had enacted in 2012. Again, this measure fails to require any new actions from the City, and thus fails to provide additional GHG reductions.

The second measure, "Beyond 2020 – Enhanced Waste Diversion" (Measure SW-2), included a host of strategies to enhance waste diversion. Notably, the CAP required, "In 2020, the City will …draft an update to the Zero Waste Resources Management Plan that will reset targets to ensure a **minimum 90 percent** diversion rate in the near future." (p. 23, emphasis.) The Progress Report provided little information on implementation of this measure, and omitted the new minimum 90% target rate that was supposed to be enacted three years ago.

Thus, the City has failed to implement these measures.

vii. Agricultural & Forestry Measures

The CAP included four measures in the realm of agricultural and forestry. None have reported any success.

Under the Urban Forestry Program (Measure AF-1), the CAP established a target to plant 200 trees each year on public rights-of-way and to require development projects to incorporate an annual average of 200 additional trees per year. (CAP, p. 3-35.) This measure involved eight strategies, of which only two have been completed (complete tree inventory, and adopt a Green Streets Ordinance.) Further, the CAP set a target requirement of 35% tree cover for new development, yet the City's proposed ordinance only requires 7-12% tree cover. (CAP, p. 4-16; Progress Report, p. 35.)

For "Urban Agriculture and Community Gardens" (Measure AF-2), half of the four strategies are reported as "Not Yet Initiated," and the other half are reportedly "infeasible." (Progress Report, p. 31.) Further, the Progress Report again omitted several of the CAP's strategies, including to "Establish a population ratio goal for community gardens within the City," "Create and implement a Community Garden Program," "Amend zoning regulations to allow for urban agriculture and community gardens in appropriate zones," and "Provide incentives to multi-family developments that include community gardens for residents." (CAP, p. 3-37.)

The CAP also included a measure for "Agricultural Lands Conservation" (Measure AF-3), in response to the development pressure in agricultural areas of South Morro Hills, and required the following strategy: "Collaborate with landowners to prepare agricultural easement grant

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applications to the SALC Program. Between 2020 and 2024, identify internal or external funding sources for minimum matching funds for up to **250 acres of agricultural preservation easements**. Between 2025 and 2029, identify internal or external funding sources for minimum matching funds for up to 250 acres of agricultural preservation easements." (p. 3-39.)

According to the Staff Report, the City has not preserved any acres yet, despite 2024 being less than one month away. Instead, the City has taken actions that actively undermine this goal, including approval of projects that result in significant loss of agricultural lands to development in South Morro Hills.

The Progress Report states, "The City has initiated dialogue with representatives of the SALC program and San Diego County's PACE program" and "will look for opportunities to promote these programs." (p. 31.) Again, the City has completely fallen short of the CAP's promises.

III. The City Is Legally Required to Implement Its CAP under CEQA

The City's September 28, 2022 CAP Implementation Report states, "The CAP is supported by the Environmental Impact Report (EIR) prepared for the first phase of the GPU, and as such, is considered a legally enforceable document."

The CAP is a binding, enforceable document. Further, the Energy Climate Element of the City's General Plan states:

> In accordance with CEQA, the City's decision to initiate a General Plan Update (GPU) has prompted the need to prepare and implement a CAP… which outlines a variety of measures **designed to mitigate the anticipated GHG emissions impacts of future development** and reduce local GHG emissions in accordance with state goals.

(Energy Climate Element, p. 3-8, emphasis added.)

The CAP is thus incorporated as a mitigation measure for the City's General Plan Update. The General Plan further includes the CAP as an appendix. The City's General Plan explains: "As the City pursues subsequent phases of the GPU, its CEQA-qualified CAP will help to ensure consistency with the state's climate action goals and policies while streamlining the local development review process." (Energy Climate Element, p. 4-7.) Further, "The City's CAP summarizes the emission sources and provides measures the City **will take** to achieve the State's 2020 and 2030 per capita GHG reduction targets." (*Id.* at p. 6-1, emphasis added.)

The City incorporated its CAP into its General Plan to mitigate GHG emissions from General Plan development. Thus, the CAP is enforceable under CEQA as a promised mitigation measure.

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An agency must implement promised mitigation measures, and where it fails to do so the public may enforce the mitigation measure under CEQA. (*Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1166.) "Mitigating conditions are not mere expressions of hope." (*Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508). Mitigation measures must be fully enforceable to ensure that they "will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." Further, the City must adhere to its General Plan. (*Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540.)

Thus, the City is legally obligated to implement its CAP.

IV. The City Cannot Use a CAP It Is Not Implementing for CEQA Streamlining

CEQA Guidelines Section 15183.5 establishes the required criteria for tiering and streamlining the analysis of GHG emissions. Of particular relevance, Section 15183.5 instructs that qualified plans should:

> (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
> (C) Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
> (D) Specify measures or a group of measures, including performance standards, **that substantial evidence demonstrates,** if implemented on a project-by-project basis, **would collectively achieve the specified emissions level**; and
> (E) Establish a mechanism to monitor the plan's progress toward achieving the level **and to require amendment** if the plan is not achieving specified levels.

(Section 15183.5, subd. (b)(1)(B)-(E), emphasis added.)

The Natural Resources Agency adopted CEQA Guidelines Section 15183.5 to address concerns that agencies preparing CAPs might "erroneously rely on a plan with purely aspirational intent to determine that a later project's cumulative impact is less than significant pursuant to section 15064(h)(3)." (**Exhibit D** [Natural Resources Agency Final Statement of Reasons for Amendments to CEQA Guidelines]). The Natural Resources Agency noted the criteria in Section 15183.5(b)(1) are intended to ensure CAPs avoid or substantially lessen a cumulative problem as required by Section 15064(h)(3), stating "Criteria (D) and (E) **are necessary** to demonstrate that the plan **will actually avoid or substantially lessen** the cumulative effects of those emissions."

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Substantial evidence does not demonstrate that the City's CAP is achieving – or will achieve – the specific emissions reductions, in contravention of the Section 15183.5 criteria and section 15064(h)(3).

The State has elaborated on the importance of implementation of emission reduction measures, explaining: "The heart of a CAP is the suite of reduction measures that will ensure that the plan achieves the selected reduction targets in a transparent and replicable manner."[7] Yet, the City is failing to implement the majority of the CAP's reduction measures.

Further, *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal. App. 4th 70, provides guidance on the level of detail needed in a GHG reduction plan. The Court of appeal found a city's GHG reduction plan inadequate given its reliance on mitigation measures that are "nonexclusive, undefined, untested and of unknown efficacy." (*Id.* at 93). The Court found that to be adequate, the plan should include measures that are "**known to be feasible,**" "coupled with **specific and mandatory performance standards**." (*Id.* at 94, emphasis added).

Further, CEQA mandates that "[i]f there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, **an EIR must be prepared for the project**." (Section 15183.5(b)(2), emphasis added.)

The City's own staff admit that the CAP is not being implemented, and that emission reduction targets are not being met. This provides substantial evidence that individual projects in the City are resulting in significant GHG impacts.

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Thus, the City's continued reliance on a CAP that fails to meet the criteria under Section 15183.5 as a streamlining tool violates CEQA. Individual projects must individually analyze and mitigate GHG impacts through preparation of environmental impact reports until the CAP is brought into compliance with CEQA.

V. Necessary Revisions to the CAP

In addition to fully complying with the CAP's implementation requirements and strategies, Preserve Calavera provides the following remedial measures necessary to bring the CAP into compliance with CEQA:

- Hire a full-time, qualified CAP coordinator, who will ensure compliance with the CAP's implementation, monitoring, and inventory requirements.

[7] https://opr.ca.gov/docs/OPR_C8_final.pdf, p. 229.

- Identify the funding necessary for successful implementation, and secure the funding before any continued reliance on the CAP as a streamlining tool. Seek new sources including through Measure X, cannabis taxes, grants, and developer impact fees.
- Ensure timely, annual progress reports, which include the detail and monitoring data that was promised in the CAP.
- Timely prepare an updated GHG inventory.
- Swiftly remedy failed strategies, and either revise or replace with measures that have known feasibility.
- Opt into the Clean Energy Alliance at the 100% renewal energy level.
- Adopt an all-electric ordinance for *all* new construction.
- Increase requirements of individual Projects to ensure CAP implementation, through financial contributions to the CAP, mitigation measures, and project design features.
- Expand the TDM program to all land uses with a lower threshold, and ensure the TDM programs are actually monitored and implemented.

VI. Conclusion

Preserve Calavera requests a meeting with the City to discuss the concerns raised herein, as well as the remedial actions and steps that are necessary to bring the City back into compliance with CEQA. As we underscored above, the City cannot continue to rely on its CAP for CEQA streamlining purposes unless and until it remedies the identified deficiencies, secures funding, and implements its CAP.

We are available at your earliest convenience. Please do not hesitate to email or call with any questions.

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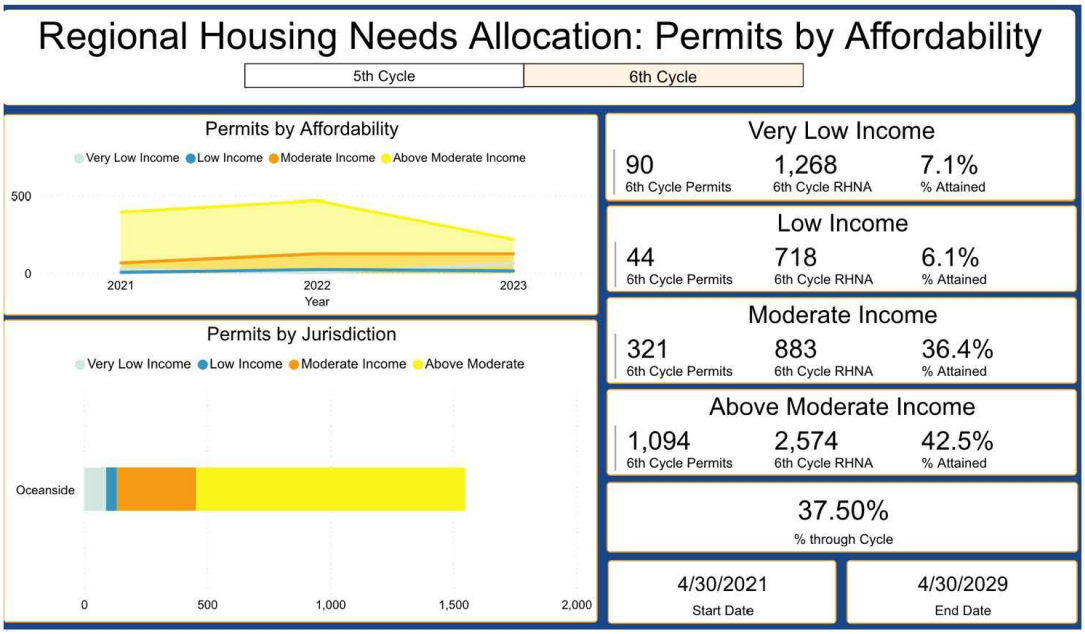
Sincerely,

Kathryn Pettit
Josh Chatten-Brown

cc

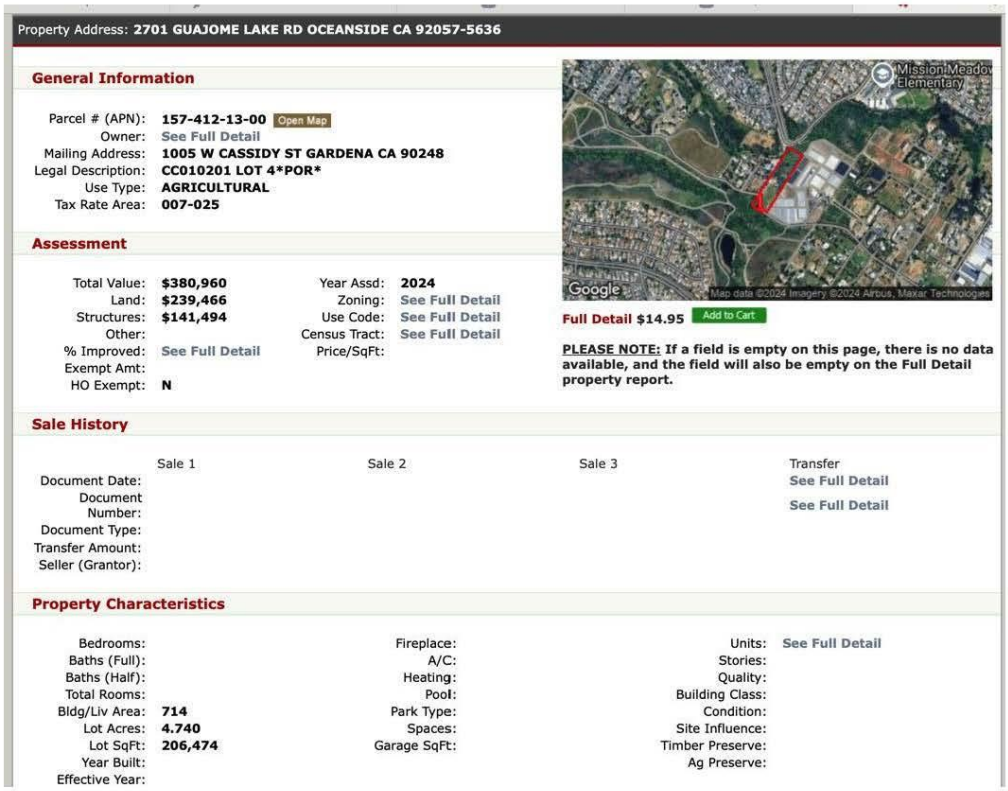
Oceanside City Attorney

Attachment C: San Diego County RHNA Dashboard for Oceanside



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Attachment D: Description of Nearby Property Under Contract for Purchase



Property Address: **2701 GUAJOME LAKE RD OCEANSIDE CA 92057-5636**

General Information

Parcel # (APN):	**157-412-13-00** Open Map
Owner:	See Full Detail
Mailing Address:	**1005 W CASSIDY ST GARDENA CA 90248**
Legal Description:	**CC010201 LOT 4*POR***
Use Type:	**AGRICULTURAL**
Tax Rate Area:	**007-025**

Assessment

Total Value:	**$380,960**	Year Assd:	**2024**
Land:	**$239,466**	Zoning:	See Full Detail
Structures:	**$141,494**	Use Code:	See Full Detail
Other:		Census Tract:	See Full Detail
% Improved:	See Full Detail	Price/SqFt:	
Exempt Amt:			
HO Exempt:	**N**		

Full Detail $14.95 Add to Cart

PLEASE NOTE: If a field is empty on this page, there is no data available, and the field will also be empty on the Full Detail property report.

Sale History

	Sale 1	Sale 2	Sale 3	Transfer
Document Date:				See Full Detail
Document Number:				See Full Detail
Document Type:				
Transfer Amount:				
Seller (Grantor):				

Property Characteristics

Bedrooms:		Fireplace:		Units:	See Full Detail
Baths (Full):		A/C:		Stories:	
Baths (Half):		Heating:		Quality:	
Total Rooms:		Pool:		Building Class:	
Bldg/Liv Area:	**714**	Park Type:		Condition:	
Lot Acres:	**4.740**	Spaces:		Site Influence:	
Lot SqFt:	**206,474**	Garage SqFt:		Timber Preserve:	
Year Built:				Ag Preserve:	
Effective Year:					

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Attachment E: HCD letter Allowing Justification For Use of Waivers

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
651 Bannon Street, Suite 400, Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

December 12, 2024

Elyse Lowe, Development Services Department Director
City of San Diego
202 C St.
San Diego, CA 92101

Dear Elyse Lowe:

RE: 970 Turquoise Street Project, San Diego – Letter of Technical Assistance

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding the application of the State Density Bonus Law (SDBL)[1] to the development project proposed at 970 Turquoise Street (Project). This letter provides technical assistance for the City of San Diego (City) and the Project applicant regarding the use of incentives and waivers under the SDBL.

Project Description and Background

HCD understands that the Project would comprise 74 dwelling units, of which five would be deed-restricted affordable to very low-income (VLI) households and another five would be deed-restricted affordable to moderate-income (MI) households, plus 139 visitor accommodation units, which are a commercial use under the City's Municipal Code.[2]

The Project's base density allows for 31 units. The Project is eligible for a 50-percent bonus (16 additional units) for the VLI units[3] and an additional 50-percent bonus (16 additional units) for MI units[4] under the SDBL. The Project is also eligible for an 11-unit bonus under the City's three-bedroom bonus provisions.

In addition, the Project is eligible for three incentives or concessions for providing the VLI units[5] and is also eligible for waivers or reductions of development standards which would have the effect of physically precluding the construction of the Project resulting from the use of those concessions or incentives.[6]

[1] Gov. Code, § 65915.
[2] San Diego Municipal Code, § 131.0112, subd. (a)(6)(K), available at https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division01.pdf.
[3] Gov. Code, § 65915, subd. (f)(2).
[4] Gov. Code, § 65915, subd. (v)(2).
[5] Gov. Code, § 65915, subd. (d)(2)(C).
[6] Gov. Code, § 65915, subd. (e)(1).

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The Project applicant proposes to use an incentive to receive an additional 2.31 Floor Area Ratio (FAR) for the commercial component. The applicant further requests a waiver of the zoned 60-foot height limit and the 30-foot height limit under the City's Proposition D, for a proposed height of 240 feet, since those height limits would physically preclude construction of the Project with the additional 2.31 FAR.

The City has requested technical assistance on the following questions:

Question #1: The City understands that incentives and waivers may be provided for non-residential uses. Given that the waivers for height and FAR are predominantly for the non-residential use, does HCD have guidance as to what factors the City may evaluate and to what extent can those waivers and incentives be used to increase the non-residential use component?

The SDBL states that a city shall grant a requested concession or incentive unless the city makes one of three findings, one of which is particularly relevant here.[7] That finding is that the incentive or concession does not "result in identifiable and actual cost reductions… *to provide for affordable housing costs*, as defined in Section 50052.5 of the Health and Safety Code, *or for rents for the targeted units* to be set as specified in subdivision (c)."[8] (Emphasis added.) Section 50052.5 of the Health and Safety Code defines "affordable housing cost" for owner-occupied housing for extremely low-income (ELI), VLI, low-income (LI) and MI households. Moreover, SDBL requires that "rents for the lower-income density bonus units shall be set at an affordable rent, as defined in Section 50053 of the Health and Safety Code."[9]

In other words, the incentive or concession must not just reduce costs (i.e., support the economic feasibility of the Project); that reduction in cost must be for the purposes of *providing affordable housing for lower-income or moderate-income households*.

The statute does not provide precise direction regarding how to determine whether the benefit of a requested incentive or concession has the requisite nexus to the provision of affordable housing. However, the Legislature's intent language provides helpful direction in implementing the SDBL provisions regarding waivers and incentives. The statute reads:

> "In enacting this chapter it is the intent of the Legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter *shall contribute significantly to the economic feasibility of lower income housing* in proposed housing developments."[10] (Emphasis added.)

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[7] Gov. Code, § 65915, subd. (d)(1).
[8] Gov. Code, § 65915, subd. (d)(1)(A).
[9] Gov. Code, § 65915, subd. (c)(1)(B)(i).
[10] Gov. Code, § 65917.

Again, the Legislature has made it clear that the purpose of incentives is to support the economic feasibility *of lower-income housing* specifically. The statute further reads:

> "The Legislature finds and declares that the intent behind the Density Bonus Law is to allow public entities to reduce or even eliminate subsidies for a particular project by allowing a developer to include more total units in a project than would otherwise be allowed by the local zoning ordinance *in exchange for* affordable units. It further reaffirms that the intent is to cover at least some of the financing gap *of affordable housing* with regulatory incentives, rather than additional public subsidy."[11] (Emphasis added.)

The City could conclude that the requested incentive in this case directly facilitates the affordable housing, in which case the SDBL compels the City to approve the requested incentive and associated waiver. On the other hand, the City might conclude that the Project does not need the requested incentive to cover the cost of "provid[ing] for affordable housing costs."[12] If the City so concludes, the SDBL places the burden of proof on the City to deny the requested incentive and associated waiver by making a written finding, based on substantial evidence, that the incentive does not result in identifiable and actual cost reductions to provide for affordable housing.[13]

Question #2: What guidance does HCD have for cities to define what is an amenity eligible for density bonus and waivers compared to what is an entirely new project component?

"Amenity" is not a term used in the SDBL. The concept of an amenity has been discussed in appellate court decisions, most notably in the context of courtyards.[14] A visitor accommodation use is not an amenity but rather a separate land use in a mixed-use project. Mixed-use projects are eligible for SDBL incentives, concessions, and waivers, consistent with the information provided in response to Question #1 above.

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Question #3: When evaluating a mixed-use project, is there a minimum amount of residential component to justify that the project is in fact a housing development? Are there any parameters that would prevent the applicant from providing 1 percent of the square footage for housing and 99 percent of the square footage for any non-residential use of its choice?

[11] Gov. Code, § 65915, subd. (u)(1).
[12] Gov. Code, § 65915, subd. (d)(1)(A).
[13] Gov. Code, § 65915, subds. (d)(1)(A), (d)(4).
[14] See, for example, Wollmer v. City of Berkeley, 179 Cal.App.4th 933 (2009) [102 Cal.Rptr.3d 19] and Bankers Hill 150 v. City of San Diego, 74 Cal.App.5th 755 (2022) [289 Cal.Rptr.3d 268].

The SDBL statute does not include a definition of "mixed-use developments" and does not explicitly require a minimum residential component (other than the minimum required five residential units).[15] However, an SDBL project would be subject to a jurisdiction's zoning requirements unless it were eligible for a concession, incentive, or waiver. For this Project, the amount of non-residential use would naturally be limited by the City's zoning requirements (including FAR and height limits) unless the Project uses a concession, incentive, or waiver to increase those limits. As discussed in the response to Question #1 above, the value of the concessions, incentives, or waivers must directly facilitate the proposed quantity and depth of affordability of the affordable units. A project whose floor area is 99 percent commercial and 1 percent residential would likely be outside of these parameters and the concessions, incentives, or waivers needed to achieve that ratio would likely not be required under the SDBL.

Finally, the SDBL statute reads, "This chapter shall be interpreted liberally in favor of producing the maximum number of total housing units."[16] While the SDBL contains no explicit requirement for a minimum percentage of residential floor area in a mixed-use development,[17] an interpretation that a project with the minimum of five residential units is essentially entitled to a theoretically infinite amount of non-residential floor area could result in an absurd outcome that does not further the fundamental purpose of the SDBL.

Question #4: If visitor accommodation uses operate as a residential use with long-term stays, can visitor accommodations and vacation rentals count towards density bonus? If so, should the units be reported as permitted units on a Housing Element Annual Progress Report for purposes of tracking RHNA progress?

O2-147
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The answer is "no." The visitor accommodation use is deemed a commercial use in the City's municipal code. In addition, the Project has already maximized the number of housing units allowed on the site on top of the 31 units allowed under the base density. There would be no legal way for the visitor accommodation units to be added to the project as housing units. Accordingly, the visitor accommodation units are considered commercial uses, not housing units, and cannot be counted for the purposes of the SDBL, nor can they be reported as housing units on an Annual Progress Report.

[15] Gov. Code, § 65915, subd. (i).
[16] Gov. Code, § 65915, subd. (r).
[17] In contrast, the Housing Accountability Act provides that, to qualify as a "housing development project," a mixed-use project must have "at least two-thirds of the square footage designated for residential use." (Gov. Code, § 65589.5, subd. (h)(2)(B).) Note that this definition is used in nearly every one of California's housing laws, including but not limited to the Streamlined Ministerial Approval Process (Gov. Code, § 65913.4 (m)(7)), the Housing Crisis Act of 2019 (Gov. Code, § 66300, subd. (a)(6)), the Permit Streamlining Act (Gov. Code, § 65940, subd. (d)), and the Affordable Housing and High Road Jobs Act (Gov. Code, § 65912.101, subd. (e)).

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Question #5: If visitor accommodation uses operate as a residential use with long-term stays, are there additional provisions of state law that would allow the City to require a deed-restriction for affordable housing?

As discussed in the response to Question #4 above, the visitor accommodation units are considered commercial uses, not housing units. Therefore, the visitor accommodation units cannot serve as deed-restricted affordable housing units.

Conclusion

The SDBL permits the City to approve the requested incentive and associated waiver *or* to deny the requested incentive and associated waiver by making a written finding, based on substantial evidence, that the incentive does not result in identifiable and actual cost reductions to provide for affordable housing. In addition, the proposed visitor accommodation units must be considered a commercial use, not a residential use.

HCD appreciates the opportunity to provide technical assistance on this matter. If you have any questions regarding the content of this letter or would like additional technical assistance, please contact Stephanie Reyes at Stephanie.Reyes@hcd.ca.gov.

Sincerely,

Shannan West
Housing Accountability Unit Chief

02-147
Cont.

Response to Comment Letter O2

Organization
Preserve Calavera
January 9, 2025

O2-1 The comment is expressing opposition to the project's use of the density bonus law, implying that the density bonus law contributes to environmental impacts.

As outlined in Chapter 3, Project Description, of the Draft EIR, the project proposes four very low-income units, which, under the Density Bonus Law, that would allow the City to grant an incentive/concession and unlimited waivers. Under *Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349, waived development standards are not considered "applicable" for determining consistency with General Plan policies or zoning regulations and were assessed accordingly in the EIR. Please also refer to Responses to Comments I2-8 above and O5-5 below. Potential environmental impacts of the project at the allowed density and with the incentive and waivers proposed have been evaluated throughout the Draft EIR. Impacts across all environmental issue areas were determined to be less than significant or reduced below significance with mitigation incorporated.

O2-2 The commenter claims that the density bonus law has been incorrectly interpreted to allow waivers that are not allowed and notes key areas of concern, including compatibility with adjacent neighborhood, the regional park, sensitive habitat, greenhouse gas (GHG) emissions, traffic, and housing.

The comment is noted as an introduction for comments that follow. Refer to Response to Comment O2-1. The EIR has been prepared in accordance with CEQA Guidelines. The technical sections included in Chapter 4 of the Draft EIR evaluates the project's compatibility with adjacent land uses, including from changes in aesthetics and visual character (Section 4.1, Aesthetics) and consistency with applicable plans (Section 4.10, Land Use and Planning). Please also refer to Response to Comment I2-8 above for further discussion on project compatibility with the surrounding neighborhood. The potential for the project to adversely impact protected plant and wildlife species and habitats is addressed in Section 4.3, Biological Resources. The potential for the project to increase GHG emissions is provided in detail in Section 4.7, Greenhouse Gases, and the potential for the project to increase vehicle trips is evaluated in Section 4.15, Traffic and Circulation. Growth associated with an increase in residential units is addressed in Section 4.12, Population and Housing, and the ability of the project to provide adequate parks and recreation facilities to serve the project demand is addressed in Section 4.14, Recreation. Impacts associated with implementation of the proposed project, including the requested waivers to the underlying zoning are addressed in the Draft EIR. Approval of requested waivers would be considered by the City after release of the Final EIR. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation., but the City acknowledges the comments and will include it for review and consideration by the decision-makers before making the final decision on the project. No further response is required or necessary.

O2-3 The commenter states their general preference for the "environmentally superior" project alternative in lieu of the proposed project. The commenter also expresses concern that the "environmentally superior" project alternative has significant adverse impacts that have not been addressed, including

similar issues to the project as they relate to compatibility with the adjacent neighborhood and park uses.

The comment is noted as stating support for the identified "environmentally superior alternative," which was the Townhome Alternative evaluated in Chapter 8, Alternatives, of the Draft EIR. As described therein, the Townhome Alternative would be considered the environmentally superior alternative because it would provide a reduced level of impact in some environmental analysis areas, including biological resources, cultural resources, and geology and soils (Draft EIR, p. 8-12). The comment recites information in the Draft EIR and does not specify an issue with that analysis. As alluded to in the comment, similar to the proposed project, in order to accommodate this alternative as allowed under the Density Bonus Law, this alternative cannot physically comply with all of the development standards included in the City's Zoning Ordinance. Based on the proposed design to accommodate density bonus units, this alternative would require similar or additional waivers of development standards, including reduction of lot sizes, removal of equestrian development standards, reduction or redistribution of setbacks, reduction of open space/landscape minimums, increase of floor area ratio per lot, and retaining wall heights. For further discussion related to the Townhome Alternative, please refer to Response to Comment I15-1 above. As no specific concerns are raised, no further response is required.

02-4 The commenter provides an introductory comment, states that the project only meets four of its five objectives, and prefaces specific comments related to the objective. Please refer to Responses to Comments 02-5 through 02-8 below.

02-5 Regarding Project Objective 1, which is to ensure both visual and functional compatibility with other nearby land uses, the comment expresses concerns that the project does not achieve functional compatibility with other nearby land uses. The commenter then refers to the requested Equestrian Overlay waiver and states that the project will not be compatible with surrounding equestrian uses, will not accommodate safe equestrian access or crossing along Guajome Lake Road, will cause extensive impacts to Guajome Regional Park, and will allow for high density development in an area with single homes and large lots along Guajome Lake Road.

In regard to concerns with requested waiver for Equestrian Overlay development standards, compatibility of the project with surrounding uses, and proposed project density, refer to Responses to Comments I2-8 and I25-3 above and O5-5 below. For discussion of potential project impacts to Guajome Regional Park, please refer to Response to Comment A2-16 above. For a detailed discussion as to why equestrian crossing on Guajome Lake Road is not proposed as part of the proposed project, refer to Response to Comment A2-13 above. As discussed in Draft EIR Section 4.10, Land Use and Planning, while the project would not provide equestrian facilities on site, it would not impact existing equestrian uses in the surrounding area. Further, the project does not propose high-density housing but single-family homes consistent with single-family land uses in the surrounding area.

02-6 Referring to project Objective 2, which is to provide new, high-quality for-sale residential units on an infill development site, the comment states the project site is not an infill site because the existing site does not have existing utilities, will require sewer extension, and will require road improvements. In response, please refer to Response to Comment I27-30 above, which describes why the project site is consistent with the Governor's Office of Land Use and Climate Innovation description of "infill development" and considered to be an infill location because the properties adjacent to the western,

northern, and eastern property boundaries are developed with residential uses and Guajome Lake Road is adjacent to the site's southern boundary. The project also proposes to place housing on underutilized land that has previously been developed in an urbanized area. Additionally, the proposed project would be served by extending the existing public utilities that serve adjacent existing development. Short utility and road extensions from adjacent existing development is common of infill development.

O2-7 Referring to project Objective 3, which is to maximize affordable and market-rate housing opportunities on a site that can be served by existing utilities, services, transit, and street access, the comment states that the addition of four affordable units would not be considered "maximizing" affordable housing opportunities and that the project site is not "currently served by existing utilities, services, transit and street access."

Based on the project's proposed land use plan, densities permitted by state law, and requested waivers of development standards, including development within buffers, the proposed project would increase the amount of developable acreage and allowable density of the site. Under the state Density Bonus Law, the Legislature has recognized that providing very low-income housing entails higher costs and delivers critical benefits in meeting state housing needs. As a result, a lower set-aside percentage (5%) is required compared to the higher thresholds for low- and moderate-income housing. The proposed 83-unit project optimizes both affordable and market-rate housing by leveraging the inclusion of very low-income units, which enables additional market-rate units under the state Density Bonus Law though the density calculation and waivers of development standards. The proposed project maximizes housing while developing within the site constraints and minimizing environmental impacts. Therefore, the project is consistent with project Objective 3, as provided in Chapter 3, Project Description (Draft EIR, p. 3-1).

Although some properties immediately east and west of the project site are on septic systems, the project site is surrounded by other existing development served by the City's sewer infrastructure. The project proposes a private sewer system that would connect to the existing City sewer infrastructure located in Old Ranch Road, northwest of the project. It is typical to have "islands" of land in rural, suburban, and urban areas that have not yet been connected to existing utility infrastructure, and to connect to existing infrastructure when those properties are developed. As such, existing public services and utilities and service systems would serve the project, as analyzed in Sections 4.13, Public Services, and 4.17, Utilities and Service Systems, and consistent with this project objective

In terms of transportation options, the project site is not directly served by public transit. However, North County Transit District operates the Santa Fe Ave & Darwin Drive Sprinter Station located approximately 1.6 miles south of the project site. Bus stops are located along N. Santa Fe Avenue, south of Guajome Regional Park. Roadway and sidewalk improvements to a segment of Guajome Lake Road are proposed by the project that would also make the project site more accessible for pedestrians and bicyclists, as analyzed in Section 4.10, Land Use and Planning (Draft EIR, p. 4.10-58). As described in Draft EIR Chapter 3, project implementation would include improving Guajome Lake Road along the project frontage towards Albright Street, approximately 1,200 linear feet, to current City roadway and fire code standards. Therefore, the project would be generally consistent with this objective, while ensuring compliance with applicable codes and regulations.

Responding to the comment, the project is currently in a high vehicle miles traveled (VMT) area that will be exacerbated by the project, the City's Traffic Impact Analysis Guidelines for VMT and level of service (LOS) Assessment identifies several types of projects that are appropriately screened out from a detailed VMT analysis as either locally serving or based on substantial evidence provided by the Governor's Office of Planning and Research Technical Advisory Committee supporting Senate Bill [SB] 743 implementation, which identifies potential screening out of VMT impacts based on small project size/trip generation, maps, transit availability, and/or provision of affordable housing. Projects consistent with the General Plan represent the vision and goals the City has for the community and therefore and do not require additional VMT analysis if they generate 1,000 average daily trips (ADT) or less. The City's VMT threshold stems from the professional expertise and judgement of the ITE San Diego section to reflect what is appropriate for the San Diego region to use for VMT. Consistent with the City's General Plan, the project is projected to generate 830 ADT, less than the 1,000 ADT threshold for further VMT analysis. Thus further VMT analysis is not required for this small project, and impacts are determined to be less than significant (see Draft EIR Section 4.15, Traffic and Transportation).

02-8 Referring to project Objective 4, which is to provide new market-rate and affordable housing on a site that is consistent with the City of Oceanside [City] General Plan, Housing Element, Zoning Ordinance, and affordable housing objectives, as well as the state Density Bonus Law, to help satisfy the City's Regional Housing Needs Allocation (RHNA) current and future demand for housing, the comment states the project is inconsistent with the Scenic Park Overlay District and the Equestrian Overlay District of the City Zoning Ordinance, making a general remark that these districts provide more specific requirements for the geographic area and project site. In regard to the requested waivers for Equestrian Overlay development standards, please refer to Responses to Comments 02-1, I2-8, 05-4, and 05-5. The receipt of a density bonus, incentive/concession, or waiver or reduction of development standards is not a valid basis to find a project is inconsistent with a zoning ordinance under state housing law (Gov. Code, § 65589.5(j)(3); *Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349). Further, as discussed in Response to Comment 05-5, the project is consistent with the Scenic Park Overlay District. The comment does not specify which specific requirements for the area they are referring to. Therefore, no further response can be provided or is required.

02-9 The commenter states that the project's conceptual landscaping plan does not adequately optimize the use of native plants, restrict the use of invasive plant species, assure permanent compliance with requirements for 12% tree canopy cover or restrictions on plantings, or address compliance with Oceanside Fire Department (OFD) restrictions on plantings within five feet of building foundations. The commenter lists the plant species present in the adjacent Guajome Regional Park. The commenter indicates that the project's conceptual landscaping plan recommends plant species that are non-native and one species on the emerging invasive plants watch list. This comment provides a general introduction to the more detailed comments 02-11 through 02-27.

This response provides an overview of regulatory requirements related to landscaping and briefly addresses each of the individual topics raised in this comment. In response, the project's conceptual landscaping plan and plant palette, included in the Draft EIR as Figure 3-5, has been updated and is included as Figure 3-5a and 3-5b in Attachment A, Figure Revisions to the Draft EIR, and referenced in Chapter 3, Errata, of this Final EIR. The choice of specific plants to be included in the landscaping plan does not alter the project's potential environmental effects provided that the plants that are included in the landscaping plan are not invasive, and meet the following regulatory requirements:

- City's Code of Ordinances, Chapter 37, Article VII, Water Efficient Landscape Regulations,
- the City's Landscape Design Manual,
- the City's Urban Forestry Program as established in Section 3049 of the Zoning Ordinance, and
- OFD requirements for fire-resistant plants within fuel modification zones (FMZs).

The conceptual landscape plan shows that a variety of tree species and drought-tolerant and low-water-use plants would be incorporated. Additionally, the project would be required to implement Mitigation Measure (MM)-BIO-2 in Section 4.3, Biological Resources, which states "plant species not to be used include any species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" List… landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides… [and] landscaping within the Subarea Plan buffers will consist of native species" (Draft EIR, p. 4.3-24).

Regarding optimizing the use of native plants, the City has not established a requirement regarding the percentage of native plants in a landscaping plan and does not require that the use of native plants be optimized, except in the City's Coastal Zone. Regarding invasive plants, implementation of MM-BIO-2 would ensure that landscaping adjacent to on- or off-site habitat does not include exotic plant species that may be invasive to native habitats (Draft EIR, p. 4.3-24).

Regarding long-term compliance with the City's Urban Forestry Program requirements to provide a minimum of 12% tree canopy, the Urban Forestry Program, as established in Section 3049 of the Zoning Ordinance also requires submittal of a Landscape and Tree Canopy Management Plan which must include information about routine and emergency tree maintenance and provides that if landscaping is not maintained in accordance with the approved management plan will be subject to code enforcement action. To ensure compliance with Section 3049 the City's standard Condition of Approval regarding the Landscape and Tree Canopy Management Plan would be applied to the project. Further, the City's Landscape Design Manual requires that landscape maintenance responsibilities be designated on the landscaping plan. This would ensure that necessary landscape maintenance occurs for all landscaping onsite, including canopy trees.

Finally, regarding plantings within five feet of building foundations, which is referred to as FMZ 0, OFD has not adopted regulations that restrict plantings within this area. Inclusion of an FMZ 0 is a recommendation for properties in the very high fire hazard severity zone and not a requirement; and as noted in Response to Comment I7-13, the project site is not located within a very high fire hazard severity zone. Further, the California Department of Forestry and Fire Protection (CAL FIRE) has not provided a detailed definition of FMZ 0 restrictions (e.g., hardscape, type or size of landscaping). However, the Fire Protection Plan (FPP) recommends that the project incorporate an FMZ 0. The commenter is correct that the conceptual landscape plan shown in Figure 3-5 (Draft EIR, p. 3-19) shows "front yard planting" adjacent to the building foundations. As noted above, please refer

to the updated conceptual landscaping plan and plant palette provided as Figures 3-5a and Figure 3-5b (in Attachment A, Figure Revisions to the Draft EIR, and referenced in Chapter 3, Errata, of this Final EIR). The proposed project would include specific FMZs, as shown in the revisions to Appendix O, Fire Protection Plan Letter Report Section 3.11.2, in Chapter 3, Errata, of this Final EIR, which states that area extending 5 feet on a horizontal plane from the exterior wall surface of a building shall be constructed of continuous hardscape or limited fire-resistant plantings acceptable to the FAHJ. These requirements have also been incorporated into the project as a Project Design Feature in Draft EIR Section 3.2.5.4, Fire Protection Plan Project Design Features. Text additions and revisions are shown in ~~strikeout~~/underline for Draft EIR Section 3.2.5, Project Design Features, Draft EIR Section 4.18, and Appendix O (refer to Chapter 3, Errata, of the Final EIR). All of the side and rear yard landscaping for each individual lot as would be the responsibility of each individual property owner. Refer to Response to Comment I7-4, which discusses maintenance and inspection responsibilities and procedures to ensure that FMZ vegetation standards are met.

O2-10 The commenter suggests several native species to use in place of western redbud (*Cercis occidentalis*) and recommends that western redbud be omitted from the landscape plan because it is native to montane regions rather than the project region and the commenter believes it is unlikely to provide a substantial canopy. The commenter's recommendation is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation. Refer to Response to Comment O2-9 above regarding plant selection and the updated landscape plan. The conceptual landscape plan shown in Draft EIR Figure 3-5 shows that western redbud would be planted around the detention basins. As shown in the updated landscape plan and plant palette in Figure 3-5a and 3-5b (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR), *Cercis Occidentalis* is no longer proposed around the detention basins. *Cercis Canadensis* is only proposed as an alternative for a Front Yard Tree as it is an approved tree by City of Oceanside. As required by the City's Urban Forestry Program, tree canopy will be calculated based on the "projected maximum growth of tree species, based on planting location." Thus, the likely tree size at this site will be factored into the final tree canopy calculations. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

O2-11 The commenter provides a recommendation that toyon (*Heteromeles arbutifolia)* be planted in lieu of other plants currently listed in the project landscaping palette, noting that toyon already occurs in the southern portion of the project site. *Heteromeles arbutifolia* is a prohibited plant as outlined in Appendix O Attachment D. Refer to Response to Comment O2-9 above regarding plant selection. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

O2-12 The commenter recommends American sweetgum (*Liquidambar styraciflua*) be removed from the plant palette to prevent introducing an invasive plant near the riparian zones. The commenter cites an on-line link to the Orange County Chapter of the California Native Plant Society's Orange County 2024 Emergent Invasive Plant List as their source. In response, the Orange County 2024 Emergent Invasive Plant List was reviewed. While American Sweetgum was listed as a plant *assessed* by the California

Native Plant Society (CNPS); based on CNPS's review it was not one of the 16 species identified on the 2024 Emergent Invasive Plant List. However, as shown in the updated landscape plan and plant palette in Figure 3-5a and 3-5b (provided in Attachment A, Figure Revisions to the Draft EIR, and referenced in in Chapter 3, Errata, of this Final EIR), this tree is no longer proposed.

02-13 The commenter recommends western sycamore (*Platanus racemosa*) be included in the landscaping plan, noting that it is a native plant that occurs on the project site's northeast boundary and that it is likely to provide substantial tree canopy. The comment recommends sourcing such trees from reputable growers. Refer to Response to Comment 02-9 regarding plant selection and refer to Responses to Comments 02-9 and 02-10 regarding compliance with the tree canopy requirements of the Urban Forestry Program. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-14 The commenter suggests several native species to use in place of strawberry tree (*Arbutus unedo*) and recommends that the strawberry tree be omitted from the landscaping plan because it is non-native. Refer to Response to Comment 02-9 above regarding plant selection. As shown in the updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR, *Arbutus unedo* has been replaced by *Arbutus marina* as it is a City approved tree.

02-15 The commenter suggests other several native species to use in place of blue palo verde (*Parkinsonia florida*) because it is native to inland deserts of southern California rather than the project region. Refer to Response to Comment 02-9 above regarding plant selection. The commenter's recommendation is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation. *Cercidium floridum* is a City approved tree that is included in the updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR.

02-16 The commenter suggests several native species to use in place of Mezcal bean (*Sophora secundiflora* syn. *Dermatophyllum secundiflorum*) because it is non-native and unlikely to provide substantial tree canopy. Refer to Response to Comment 02-9 above regarding plant selection. The commenter's recommendation is noted. This tree is no longer proposed. Refer to updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR.

02-17 The commenter suggests several other native species to use in place of desert willow (*Chilopsis linearis*) because this species is native to inland desert regions of California and not the project region. In response, *Chilopsis linearis* is a City approved tree. Refer to Response to Comment 02-9 above regarding plant selection. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-18 The commenter suggests several native canopy tree species to use in place of chitalpa (*x Chitalpa tashkentensis*), stating this species is non-native and its parent species are not native to the project site. Refer to Response to Comment 02-9 above regarding plant selection and compliance with the tree canopy requirements of the Urban Forestry Program. The commenter's recommendation is noted.

This tree is no longer proposed. Refer to updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR.

02-19 The commenter suggests several native canopy tree species to use in place of sweet bay (*Laurus nobilis*) because this species is non-native and unlikely to provide substantial tree canopy. Refer to Response to Comment 02-9 above regarding plant selection and refer to Responses to Comments 02-9 and 02-10 regarding compliance with the tree canopy requirements of the Urban Forestry Program. *Laurus nobilis* is a city approved tree. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-20 The commenter suggests several native canopy tree species to use in place of willow pittosporum (*Pittosporum phillyraeoides*) because this species is non-native and unlikely to provide substantial tree canopy. Refer to Response to Comment 02-9 above regarding plant selection and refer to Responses to Comments 02-9 and 02-10 regarding compliance with the tree canopy requirements of the Urban Forestry Program. The commenter's recommendation is noted. This tree is no longer proposed. Refer to updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR.

02-21 The commenter suggests several native canopy trees to use in place of pink trumpet tree (*Handroanthus impetiginosus* syn. *Tabebuia impetiginosa*), stating this species is non-native. Refer to Response to Comment 02-9 above regarding plant selection and refer to Responses to Comments 02-9 and 02-10 regarding compliance with the tree canopy requirements of the Urban Forestry Program. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-22 The commenter suggests several native species to use in place of java cassia (*Cassia javanica*), stating this species is non-native. Refer to Response to Comment 02-9 above regarding plant selection. The commenter's recommendation is noted. This tree is no longer proposed. Refer to updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR.

02-23 The commenter suggests several native tree canopy species to use in place of Australian willow (*Geijera parviflora*), stating this species is non-native and unlikely to provide substantial tree canopy. *Geijera parviflora* is a city approved tree. Refer to Response to Comment 02-9 above regarding plant selection and refer to Responses to Comments 02-9 and 02-10 regarding compliance with the tree canopy requirements of the Urban Forestry Program. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-24 The commenter suggests several native canopy tree species to use in place of Mondell pine (*Pinus eldarica*) because this species is non-native. Refer to Response to Comment 02-9 above regarding plant selection and refer to Responses to Comments 02-9 and 02-10 regarding compliance with the tree canopy requirements of the Urban Forestry Program. The commenter's recommendation is noted.

This tree is no longer proposed. Refer to updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR.

O2-25 The commenter suggests several native canopy tree species to use in place of holly oak (*Quercus ilex*), stating this species is non-native. Refer to Response to Comment O2-9 above regarding plant selection and refer to Responses to Comments O2-9 and O2-10 regarding compliance with the tree canopy requirements of the Urban Forestry Program. The commenter's recommendation is noted. This tree is no longer proposed. Refer to updated landscape plan and plant palette in Figure 3-5a and 3-5b in Chapter 3, Errata, of the Final EIR.

O2-26 The commenter states that the project's landscaping plan did not address the specific conditions of the OFD for plantings in the FMZ within five feet of building foundations, as detailed in the project's Fire Protection Plan Letter Report (Appendix O). Refer to Response to Comment O2-9, which explains that the FMZ 0 is required to be constructed of continuous hardscape or limited fire-resistant plantings acceptable to the FAHJ. The City would verify compliance with the FMZs at the time that the developer submits the final landscape plan for City review and approval while side and rear yard landscaping for each individual lot as would be the responsibility of each individual property owner. Also refer to Response to Comment I7-4, which discusses maintenance and inspection responsibilities and procedures to ensure that FMZ vegetation standards are met.

O2-27 The commenter states that there is no mechanism specified to ensure the landscaping conditions, especially the minimum 12% tree canopy cover, are in place for the life of the project. Refer to Response to Comment O2-9 regarding the requirements under the Urban Forestry Program of the Landscape and Tree Canopy Management Plan and the Condition of Approval that would be applied to the project to ensure compliance with Section 3049 of the Zoning Ordinance.

O2-28 The commenter requests additional information be provided regarding parking, specifically on-street parking, and parking for guests/vendors. In response, as described in Draft EIR Chapter 3, Project Description, each residence would include a two-car garage and a private driveway that would allow for parking of two more cars and additional parallel on-street parking would be provided on the sections of internal roadways that are 32 feet wide (Draft EIR, pp. 3-5 and 3-9), allowing for approximately 10 additional on-street guest parking spots . Internal roadways have been designed to meet OFD's requirements for emergency access and truck turnarounds and allowing on-street parking on one side of the 32-foot-wide street sections has been accommodated (Draft EIR Appendix O, p. 15). Further, parking is generally considered a social impact, not an environmental impact subject to CEQA (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 697). This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

O2-29 The commenter suggests the project could incorporate sustainable design features beyond those required by state law and/or the Building Code. The impacts of the project as proposed have been thoroughly evaluated in the Draft EIR and the project's impacts related to sustainability (e.g., the project's impacts to Greenhouse Gas emissions) were determined to be less than significant with implementation of mitigation measures identified throughout the EIR. Please also refer to Project Design Features that were discussed elsewhere in the Draft EIR and were added to Draft EIR Chapter

3, Project Description (see Chapter 3, Errata, of this Final EIR). This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-30 The commenter requests more detail on the project's compliance with the Scenic Park Overlay District requirements related to development standards such as grading limitations, view preservation, building height, building materials and finishes, and signs, listed as particular areas of concern.

The City's Scenic Park Overlay District is defined in Article 22 of the City's Zoning Ordinance and outlines the regulations that apply to parcels within this District. The purpose of the ordinance is to conserve natural resources of recreational areas in and adjacent to Guajome Regional Park, encourage retention of natural slopes and waterways, minimize grading and drainage alteration, achieve visual compatibility between the built environment and natural environment, and provide standards and criteria for new construction, alteration, and development within the district (Draft EIR, p. 4.10-7). Please refer to Response to Comment 05-5 below, which describes the project's consistency with the Development Regulations set forth in Section 2204 of the Zoning Ordinance for the Scenic Park Overlay District. In summary, Chapter 3, Project Description, and Section 4.1, Aesthetics, of the Draft EIR at pages 4.1-7 and 4.1-8 identify the architectural designs of the proposed homes, including massing, materials, heights, roof forms, window grids and window and door trim, front door and garage door styles, outdoor lighting that complies with Chapter 39 of the City Municipal Code (light pollution regulations), proposed landscaping, and retaining walls. Further, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses. Final site plans and landscape plans would be subject to review and approval by the City, further ensuring compatibility. Thus, the project would be consistent with this regulation. As provided in Draft EIR Chapter 3, Project Description, the project's entry monumentation would use the proposed corner retaining wall in compliance with the Scenic Park Overlay District standards for signs (Draft EIR, p. 3-4).

02-31 The commenter notes it is unclear if there is only one requested waiver related to retaining wall requirements, notes that the Draft EIR states that the retaining walls will not be plantable but also talks about softening the look of retaining walls, and states that in the commenter's experience plantable walls are often unsuccessful and unattractive.

No plantable retaining walls are proposed; the requested waivers related to retaining walls are to not include plantable retaining walls and to allow retaining walls exceeding 6 feet in height because three wall sections are proposed to have heights of 9 feet, 10 feet and 12 feet, as noted in Draft EIR Table 3.3-1 and updated in Chapter 3, Errata, of this Final EIR. Planting areas are proposed in the space between the tiered retaining walls along the project site frontage on Guajome Lake Road to create a welcoming approach for those entering from the street (Draft EIR, p. 3-4). The City is responsible for review of a project's development plans for compliance with the applicable review criteria and requirements of the City's Zoning Ordinance.

02-32 This comment expresses concern over the condition and safety of Guajome Lake Road, notes that the project would add hundreds of new vehicle trips to the road, and requests the City improve this road for the safety of vehicles, bicycles, and pedestrians. The commenter also suggests establishing a

thoroughfare improvement district and requiring all projects that access the road to pay their fair share towards such needed improvements.

As described in Draft EIR Chapter 3, Project Description, the project would improve Guajome Lake Road along the length of the property frontage, connecting to Albright Street, approximately 1,200 linear feet. Road improvements would include 40-foot-wide curb to curb improvements, including a 5-foot-wide parkway and a 5-foot-wide sidewalk (Draft EIR, p. 3-5), which would improve safety for this portion of the road. As noted in Appendix K, Draft Local Transportation Assessment, the City's Bicycle Master Plan 2017 Update does not identify a planned bicycle lane on Guajome Lake Road (Draft EIR Appendix K, p. 6). The Draft EIR concluded that no off-site improvements road improvements other than paving Guajome Lake Road along the project site frontage and northwest to Albright Street are recommended because the project would not result in traffic impacts and "the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities" (Draft EIR, p. 4.15-16). Thus, the traffic generated by the project does not result in the need to create a thoroughfare improvement district. Improvements to the remaining unpaved portion of Guajome Lake Road would be the responsibility of the City. The project will also be required to pay thoroughfare and traffic fees totaling $300,128 (assuming current rate of $3,616/unit). These fees are intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process.

02-33 This comment asserts Draft EIR Section 4.1, Aesthetics, fails to evaluate project compliance with aesthetic-related requirements of the Scenic Park Overlay District (SPOD) and Guajome Lake Sphere of Influence (SOI). The comment also references specific SOI policies (Policies F, H, I, and J) and asserts these should be evaluated within the aesthetics analysis.

In regard to Scenic Park Overlay District discussion within the aesthetics analysis, Section 4.1.2, Regulatory Setting, in Draft EIR Section 4.1, Aesthetics, provides an overview of the Scenic Park Overlay District. Scenic Park Overlay District compliance is also demonstrated in threshold discussions under Draft EIR Section 4.1.3, Thresholds of Significance (see thresholds a and c in Draft EIR Section 4.1). Specifically, these threshold discussions describe project features that are consistent with the Scenic Park Overlay District zone and specifies that project development plans within the Scenic Park Overlay District shall be reviewed for compliance with the review criteria and requirements of Article 22 and with all other applicable requirements of the City Municipal Code In addition, Draft EIR Chapter 3, Project Description, describes architectural design features that are consistent with Scenic Park Overlay District requirements. Please also refer to Response to Comment 05-5 below for a detailed discussion of the project's consistency with the development regulations set forth in Section 2204 of the Zoning Ordinance for the Scenic Park Overlay District. Also refer to Response to Comment 05-5 below for detailed discussion of the project's consistency with the Scenic Park Overlay District development regulations set forth in Section 2204 of the Zoning Ordinance.

In regard to the Guajome Regional Park SOI discussion within the aesthetics analysis, Draft EIR Section 4.1, Aesthetics, provides the objectives and policies for the Guajome Regional Park SOI. In addition, project compliance with SOI policies is demonstrated in the threshold discussions under Draft EIR Section 4.1.3, Thresholds of Significance (see threshold a and c in Draft EIR Section 4.1). Specifically, these threshold impact discussions describe project features, including architectural style, massing, building exteriors and materials, landscaping, views of the project site from Guajome Regional Park,

and how the project would be designed to blend with the surrounding environment, consistent with and subject to the objectives and policies under the Guajome Regional Park SOI as outlined under Draft EIR Section 4.1.2.

02-34 Citing Policy F of the Guajome Regional Park SOI, which provides the policy that structures are not permitted on slopes abutting Guajome Regional Park, the commenter states all housing is proposed to be built on a slope abutting the park and states this should be evaluated in aesthetic analysis. Refer to Response to Comment O2-33 above. While the project site is gently sloping from approximately 141 feet above sea level to approximately 186 feet above sea level, the development would not be "built on a slope" abutting the park. The site would be appropriately graded to accommodate the development and proposed homes would not abut Guajome Regional Park because they would be setback on the lots located south of existing Guajome Lake Road.

02-35 Citing Policy H of the Guajome Regional Park SOI, the commenter states the policy provides structures be oriented to protect views of the park and surrounding properties, that the view analysis did not fully consider these views, and this should be evaluated in the aesthetic analysis. Refer to Response to Comment O2-33 above. To clarify, Policy H provides structures be oriented to preserve views from Guajome Regional Park, the development, and surrounding properties. Section 4.1.4 of the Aesthetics section of the Draft EIR (Draft EIR, p. 4.1-6) explains:

> Direct views of the project site are limited to adjacent residences to the east, north, and west and to users of Guajome Regional Park trails adjacent to the project site's southern boundary across Guajome Lake Road. In proposed conditions, the project would be visible from adjacent parcels and may be visible from some distant public viewpoints due to the proposed height of the buildings. However, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses.

As described in Section 4.1, Aesthetics, of the Draft EIR on page 4.1-8, the Draft EIR also explains that the proposed development would be set back from Guajome Lake Road and adjacent residences to provide privacy and visual relief, with landscaping designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. The project would be consistent with this policy for the reasons detailed in the Draft EIR.

02-36 Citing Policy J of the Guajome Regional Park SOI, which provides the policy that transition areas be provided between landscaped and natural vegetation, the commenter states no such transition area is identified and states this should be evaluated in aesthetic analysis. Refer to Response to Comment O2-33 above. The project site does not abut the park here, Guajome Lake Road is located between Guajome Regional Park and the project site. As described in Draft EIR Chapter 3, Project Description, a variety of vegetation deriving influence from Guajome Regional Park would be featured along the boundaries of the project site. Landscaping would also be featured adjacent to public rights-of-ways. Accordingly, there is a transition between landscaped and natural vegetation to the extent feasible.

02-37 Citing Policy I of the Guajome Regional Park SOI, which provides that development shall incorporate features such as landscaping, open areas, and pathways with those of the park, the comment states there's no indication this has been considered and states this should be evaluated in the aesthetic

analysis. The comment also states the pathway within the park that parallels Guajome Lake Road will be impacted by the project because of increased traffic volumes. Refer to Response to Comment O2-33 above. For clarification, the Policy referenced is "L," which provides, "Developments shall integrate features such as landscaping, open areas, and pathways with those of Guajome Regional Park while also establishing a clear demarcation between public and private property." Draft EIR Chapter 3, Project Description, and 4.1, Aesthetics, explain how the project open space and theming of the community take into consideration the projects proximity to Guajome Regional Park and the history and culture of the site. The design is intended to pay homage to the community's cultural assets, such as the Rancho Guajome Adobe. Forms and patterns found in the open space take inspiration from these historic and unique visual profiles. Amenities and materiality are influenced by the equestrian nature of the surroundings and local points of interest, creating a natural and rustic landscape for the residents. The planting layout was designed to be compatible with the visual character of the Park. A variety of vegetation deriving influence from Guajome Regional Park would be featured along the boundaries of the project site and demarcating the private property would be entry monumentation.

O2-38 The comment is referencing the Guajome Regional Park SOI discussed in Draft EIR Section 4.1, Aesthetics, and questions if the analysis evaluated consistency with the objectives and policies under the Guajome Regional Park SOI. Refer to Responses to Comments O2-33 through O2-37 above. The Draft EIR considered consistency with these objectives and policies. Further, as noted in the Draft EIR, future City review of project development plans would ensure continued consistency with these objectives and policies.

O2-39 The commenter states that the project's proposed outdoor lighting could impact on-site sensitive habitat.

As discussed in Draft Section 4.3, Biological Resources, an evaluation of the project's potential to impact sensitive habitat, including from lighting, is included under Threshold a on page 4.3-20. Potential impacts, including noise, lighting, increased human presence, and vehicle traffic within the site. In addition, MM-BIO-2, requires all lighting adjacent to all on- or off-site habitat to be directed away from and/or shielded so as not to illuminate native habitats.

O2-40 The commenter asserts that the general plan is interrelated to the zoning ordinance and that the Draft EIR provides detailed tables that assess compliance with provisions of the General Plan but fails to discuss compliance with zoning. The comment also references guidance for preparing general plans, which is noted but not relevant to this project.

In response, Project compatibility with the zoning ordinance is addressed in several places throughout the Draft EIR. In Draft EIR Chapter 3, Project Description, Table 3.3-1 provides a summary of the applicable single-family residential development standards outlined in the City's Zoning Ordinance and to demonstrate compliance with the single-family residential development and where density bonus waivers are requested. Draft EIR Chapter 3 also describes design features of the project and their compliance with the City's Zoning Ordinance, including Article 3049, Urban Forestry Program and Scenic Park Overlay Zoning District. Project compatibility with applicable zoning is also discussed throughout Draft EIR Chapter 4, Impact Analysis, including Section 4.1, Aesthetics; 4.2, Air Quality; 4.3, Biological Resources; 4.7,Greenhouse Gases; Section 4.10, Land Use and Planning; 4.12, Population and Housing; and 4.17, Utilities and Service Systems. The EIR analysis demonstrates the project's consistency with the City's Zoning Ordinance explaining that with approval of the requested density

bonus, the proposed project would be consistent with the City's zoning designation for the project site and implementation of the project would not conflict with the City's Zoning Ordinance. For detailed discussion in regard to requested waivers to the Equestrian Overlay Zone and the Scenic Park Overlay District, please refer to Responses to Comments O2-5 above and O5-5 below. A more detailed summary of project compliance with applicable development standards, including overlay standards, has been added to Draft EIR Table 3.3-1, Text changes to Table 3.3-1 are indicated in ~~strikeout~~/ underline in Chapter 3, Errata, of this Final EIR.

O2-41 The comment provides information from the project's Notice of Availability related to the existing General Plan and Zoning Designations of the project site and states that the general plan and zoning designations are key to understanding the allowed land use for the site. This comment is noted. Please refer to the general plan and zoning discussion and analysis in Draft EIR Section 4.10, Land Use and Planning, and Response to Comment O2-40 above. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. Therefore, no further response is required.

O2-42 The commenter states the Draft EIR fails to properly consider the impacts of waiving provisions of the Equestrian Overlay District, noting that the Zoning Ordinance identifies three specific exceptions to the overlay district requirements and asserting that none of them are applicable to the project. The commenter states that there is nothing in the Zoning Ordinance that allows waiver of the entire overlay district requirements unless such alterations would still meet the purpose for which the Equestrian Overlay District was established. The commenter also references an earlier version of the project accommodated horses and notes it is still unclear if the project will accommodate horses because Appendix O contains discussion on horse trailers.

The commenter is correct that none of the exceptions presented in Zoning Ordinance Section 2802 apply to the project. Refer to Responses to Comments O5-3 through O5-5 below, which explain the project is entitled to the requested waivers of the Equestrian Overlay District standards under the state Density Bonus Law. Further, Section 2808 allows the City to "grant one or more exceptions or alterations to the design criteria or development standards." This section does not limit the number of exceptions that may be granted "provided that the general and specific purposes of [Article 28] are achieved." The purposes of Article 28 are to provide for recreational opportunities in the form of an equestrian trail network, establish design standards and criteria that accommodate keeping horses on private property, maintain an equestrian and rural atmosphere where horse trails are integrated with open space and urban areas, and maintaining visual compatibility of the human-made and natural environment by ensuring sufficient space for equestrian uses. As discussed in Draft EIR Section 4.10, the project would be consistent with the surrounding residential land uses and would not impact the existing equestrian uses in the surrounding area (Draft EIR, p. 4.10-15); thus, the project would not obstruct attainment of the purposes of Article 28. There may have been an earlier development considered for the site that accommodated horses, but the project under review does not.

Appendix O only mentions horse trailers as a potential vehicle during project operations, in addition to delivery trucks, and emergency vehicles, that would be accommodated by a full-width-cul-de-sac bulb proposed at the northern end of the access road to turn around in this location (Draft EIR Appendix O, p. 14). However, as previously mentioned, equestrian facilities are not contemplated as part of the project. For clarification, text stating "horse trailers" and "common equestrian areas" has

been removed; please see the revisions shown in ~~strikeout~~/underline for Appendix O in Chapter 3, Errata, of this Final EIR.

02-43 The commenter questions how the requested waiver of the Equestrian Overlay District would impact adjacent equestrian properties and how horses in surrounding areas would access the Guajome Regional Park.

The project site is privately-owned and not required to provide access for equestrians. There are no equestrian trails that cross the project site currently and no access point into the park immediately across from the project site; thus, there is no legal path of travel for equestrians to access Guajome Regional Park through this site and the proposed development would not impede equestrians from using the existing access points. As noted in Draft EIR Chapter 3, Project Description, and Section 4.10, Land Use and Planning, the project would not provide equestrian facilities on site and would not impact the existing equestrian uses in the surrounding area (Draft EIR, p. 4.10-15). As discussed in the Draft EIR, the project is seeking to obtain waivers of specific equestrian development standards to accommodate the density bonus units—it is not seeking to eliminate the overlay. A detailed discussion of the waiver is provided in Responses to Comments O5-3 through O5-5 below. As discussed in Responses to Comments I10-4 and I25-7 above, the project would also not result in the removal of any existing equestrian trails and does not propose any barriers to Guajome Regional Park for equestrian riders in the area.

02-44 The commenter references past projects that have requested waivers for Equestrian Overlay District conditions, asserting that the City has required "extensive justification" for prior waivers and that the EIR does not provide similar justification. CEQA does not require an analysis of past projects that may have been litigated or an analysis of prior projects that requested waivers to the Equestrian Overlay District. The EIR provides justification for the requested waiver, noting that it is necessary to "accommodate the project as allowed under the Density Bonus Law" (Draft EIR, p. 3-2). Please refer to Responses to Comments O5-3 through O5-5 below for additional discussion of the requested waiver. It is unclear what "extensive justification for prior waivers" the comment is referring to. The commenter may be referencing Section 2808 of Article 28 (Equestrian Overlay) that outlines a process for alteration of standards of the Equestrian Overlay that would preclude development at or near base density and the City requiring "extensive justification" was based on a Zoning Ordinance provision that is not applicable under Density Bonus Law.

02-45 The commenter expresses concern that the requested Equestrian Overlay District waiver is not allowed under the Density Bonus Law and believes the City cannot approve the requested waivers. The comment asserts that allowing this waiver would "completely eliminate all local zoning at every level." The comment states that the Density Bonus Law allows waivers and concessions specifically for "density, lot size, setbacks, walls, parking, transit requirements etc." and asserts that these are design or development standards rather than zoning standards.

The comment generally addresses a legal, not an environmental issue. Notwithstanding, please refer to Response to Comment O5-5, which demonstrates the exact types of standards for which the project requests a waiver. Government Code Section 65915 (e) (1) states "In no case may a city, county, or city and county apply any development standard that will have the effect of physically precluding the construction of a development meeting the criteria of subdivision (b) at the densities or with the concessions or incentives permitted by this section. Nothing in this subdivision shall be interpreted to

require a local government to waive or reduce development standards if the waiver or reduction would have a specific, adverse impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon health, safety, or the physical environment, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact." As discussed in the Draft EIR, the project is seeking to obtain waivers of specific equestrian development standards to accommodate the density bonus units—it is not seeking to eliminate the overlay. To better clarify project compliance with applicable development standards and requested waivers, additional information has been added to Draft EIR Table 3.3-1, Text changes to Table 3.3-1 have been made in ~~strikeout~~/ underline in Chapter 3, Errata, of this Final EIR. Further, the Draft EIR demonstrates that with implementation of mitigation measures, the project would not result in an adverse effect to health, safety, or the physical environment. Thus, the Density Bonus Law does not preclude the City from granting the requested waivers from the Equestrian Overlay District development standards.

In addition, while the applicant's requests as they relates to the Equestrian Overlay District address waivers of development standards within that district, the project is also entitled to an incentive/concession under the Density Bonus Law, which may be broader than development standards and may include regulatory incentives or concessions (Gov. Code, § 65915 (k)(3)). Please also refer to Responses to Comments O5-3 and O5-4 below for additional discussion of this concern.

O2-46 The commenter implies that the intentions of Article 28 (Equestrian Overlay District) of the City's Zoning Ordinance are clear and refers to language under section 2801, Specific Purposes.

Article 28, Equestrian Overlay District, Section 2801, Specific Purposes, identifies four specific purposes (A-D):

A Provide for recreational opportunities by establishing an equestrian trail network around Guajome Regional Park and the San Luis Rey River within the Guajome Neighborhood Planning Area.

B Provide appropriate design standards and criteria for the keeping and protection of horses on private property.

C Create, enhance, and protect the equestrian and rural atmosphere within the overlay area by integrating open space areas and urban areas with horse trails.

D Achieve a visually pleasing and compatible relationship between buildings and accessory structures, horse trails, open space and planting areas, and the natural environment by providing appropriate buffers between equestrian and non-equestrian uses.

The commenter states the project does not meet the first purpose (A) because it does not provide trails accessible to the public. The first specific purpose related to providing "an equestrian trail network around Guajome Regional Park and the San Luis Rey River within the Guajome Neighborhood Planning Area" is not intended to allow public access on private lands within the Guajome Neighborhood Planning Area, as implied by the commenter. In addition, the commenter appears to misunderstand the intent of this purpose and incorrectly implies "intentions" and "development standards" of the City's Zoning Ordinance have the same definition or purpose related to a proposed development project; refer to Responses to Comments O2-42 above for discussion on Article 28's purpose and O2-45 on waivers of development standards.

02-47 The comment is referencing the second (B) specific purpose of Article 28 (shown in Response to Comment 02-46 above) and states the project would eliminate horses on the property with no legal precedent upon which to eliminate this requirement and intent. In response, the property is vacant and does not contain any horses. Therefore, project implementation would not result in the removal of horses from the property. In addition, the commenter appears to misunderstand the intent of this purpose and incorrectly implies "intentions" and "development standards" of the City's Zoning Ordinance have the same definition or purpose related to a proposed development project. Refer to Responses to Comments 02-42, 02-45, and 02-46 above.

02-48 The comment is referencing the third (C) specific purpose of Article 28 (shown in Response to Comment 02-46 above) and infers that the project waiver would destroy or eliminate an equestrian and rural atmosphere.

For a summary of project compatibility with the surrounding environment, please refer to Responses to Comments I2-8, 02-46, and 02-47 above. The project has also been designed to preserve approximately 7 acres in the northernmost portion of the site developing the remaining approximately 10 acres in the southern portion of the project site, which has been previously disturbed and graded (Draft EIR, p. 3-2). In addition, the project includes an approximately 35,151 square feet of private recreational and amenity area within the development. The project also includes three homes styles, referred to as "ranch," "farmhouse," and "progressive prairie." The design takes into consideration proximity to Guajome Regional Park and the history and culture of the site. Amenities and materiality are influenced by the equestrian nature of the surroundings and local points of interest, creating a natural and rustic landscape for the residents. Further, the design is intended to pay homage to the community's cultural assets, such as the Rancho Guajome Adobe (Draft EIR, p. 3-4). As stated in Section 4.14.4 of the Draft EIR: "The project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses in the surrounding area."

02-49 The commenter references the fourth (D) specific purpose of Article 28 (shown in Response to Comment 02-46 above) and states that the area must provide horse amenities, trails, and open space and cannot be waived. In regard to the waiver concern, refer to Refer to Responses to Comments 02-42, 02-45, and 02-46, as well as Responses to Comments 05-3 through 05-5 below for additional discussion of the requested waiver. In regard to horse amenities and trails, the project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses, including equestrian trails, in the surrounding area. Please refer to Response to Comment I2-3 for responses addressing that the project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses, including equestrian trails, in the surrounding area access. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-50 The commenter refers to Section 2804 of Article 28 to support their position that not including horses and equestrian amenities would create a potential conflict with adjacent horse properties. As discussed in Draft EIR Section 4.10, Land Use and Planning, while the project would not provide equestrian facilities on site, it would not impact existing equestrian uses in the surrounding area. Please refer to Responses to Comments 02-5 above and 05-5 and 05-8 below. The case cited of a cattle feed lot feeding up to 30,000 cattle adjacent to residential uses causing a conflict is quite distinguishable from

this proposed single-family residential project nearby other single-family residential uses, a couple of which keep horses.

02-51 The commenter suggests that the project would conflict with the Guajome Regional Park SOI plans and intentions. The commenter also states that there is not a shred of legislative intent that a new density bonus development should be able to negatively impact local control and regional planning nor remove public benefit from the uses of this land.

In regard to project consistency with the Guajome Regional Park SOI objectives and policies, refer to Responses to Comments O2-33 above. In response to commenter's concerns related to a new density bonus development, the comment raises legal, economic, social, or political issues that do not relate to any physical effect on the environment. As such, no further response is required under CEQA. The comment will be included in the Final EIR for consideration by decision-makers before a final decision on the project. The site is private – not public – property designated for residential uses. The commenter is also referred to Responses to Comments O5-3 through O5-5 below.

02-52 The commenter states that the "Housing Plan demonstrates this land is not needed to satisfy the number of units required to be met" and the project site's "property was never on the list of proposed zoning changes for greater density." It appears the commenter is referring to the City's Housing Element. In response, the project is not requesting an amendment to the City's General Plan nor a rezone. The project site is designated for single-family residential use under the City's General Plan and Zoning Ordinance, independent of its inclusion in the Housing Element's sites inventory. Additionally, any new residential units constructed within the City, regardless of location, contribute toward meeting the City's RHNA obligations. The comment raises legal, economic, social, or political issues that do not relate to any physical effect on the environment. As such, no further response is required under CEQA. On the waiver requests to the Equestrian Overlay District, please refer to Responses to Comments O2-42, O2-45, and O5-3 through O5-5.

02-53 The commenter refers to an attachment (Attachment E) to their letter on another project in the City of San Diego requesting waivers under the state Density Bonus law from City of San Diego development standards that was reviewed by the California Department of Housing and Community Development (HCD). The comment raises legal, economic, social, or political issues that do not relate to any physical effect on the environment. No further response is required under CEQA. Although not a CEQA issue, please refer to Responses to Comments O5-2, O5-3, and O5-4, addressing requirements of Density Bonus Law and that a project that meets Density Bonus Law eligibility criteria is entitled to a density bonus, concessions/incentives, development standard waivers, and reduced parking ratios. As further detailed in Response to Comment O5-3, Assembly Bill (AB) 1287 prohibits cities from requiring additional reports, studies, or reasonable documentation to justify eligibility for incentives/concessions and waivers (Gov. Code, § 65915, subd. (a)(2)). As further detailed in Response to Comment O5-2, density bonuses and related provisions are mandatory, and agencies must avoid creating the perception of discretionary authority to deny them (see, e.g., *HCD Guidance to the City of Glendale*, February 5, 2024, available at Discretionary Review of State Density Bonus Law Waiver Requests – Letter of Technical Assistance; *Wollmer, supra,* 193 Cal.App.4th at 1349 [CEQA and Density Bonus Law must be harmonized]). A more detailed summary of project compliance with applicable development standards, including overlay standards, has been added to Draft EIR Table 3.3-1, Text changes to Table 3.3-1 are indicated in ~~strikeout~~/underline in Chapter 3, Errata, of this Final EIR.

02-54 The comment states waiver of the Equestrian Overlay development standards could result in cumulative impacts. The commenter appears to be referencing anecdotal information from a resident that lives in the area regarding prior waivers and improvements required under the Equestrian Overlay District that were never constructed. The comment goes on to note that additional mitigation is required to address cumulative impacts, including a suggestion that the City adopt a Right to Horses Ordinance. The Draft EIR evaluates cumulative impacts in Chapter 6, Cumulative Effects. Please refer to Response to Comment O2-44 regarding prior waivers to the Equestrian Overlay District. The comment speculates about waivers being sought by future projects that are not currently known or reasonably foreseeable, particularly in this infill area surrounded by already developed properties. Further CEQA analysis is not required to address such speculation. This is not a comment on the adequacy of the Draft EIR. The commenter's suggestion that the City adopt a Right to Horses Ordinance is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-55 The commenter notes there is an inconsistency in what is assumed for the number of units and project construction/grading in Draft EIR Chapter 3, Project Description, and Appendix B, Air Quality and Greenhouse Gase Emissions: Analysis Technical Report, and notes it may impact the air quality modeling.

The project description in Appendix B stated that the project would develop 84 residential units, while the EIR project description states that the project would develop 83 units. The air quality analysis modeled development of 84 units, which constitutes a more conservative approach. There is no distinction between the number of affordable and market rate units for the purposes of the modeling; therefore, no change in this regard is required. In regard to the typo of estimated year for a construction date indicated on page 27 of Appendix B, it has no effect on the 1-month assumption included in the same rows. The grading assumptions for modeling are based on the total number of days, not the specific dates. Thus, there would be no change required for the analysis. Nonetheless, text in Appendix B referring to 84 residences or 9 affordable units has been revised to reflect 83 units and 4 affordable units, and modeling has been updated, as shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR.

02-56 The commenter suggests project completion could be delayed to as late as 2027 which could change the threshold for the project's VMT which is based on 2024 in the air quality analysis. The estimated 2023 start date for construction represented the earliest possible start date at the time the air quality technical report was prepared. The project is calculated to generate 830 ADT, regardless of the year, which would not exceed the City's 1,000 ADT screening threshold for further VMT analysis. Therefore, the project is screened out of requiring a transportation VMT analysis (Draft EIR, p. 4.15-2) and no change to the analysis is necessary based on the delay in project construction. Refer also to Response to Comment O2-7, above.

02-57 The commenter states the Draft EIR does not comply with the San Diego Air Pollution Control District (SDAPCD) dust control rules because it does not correctly characterize the language of Rule 55, Fugitive Dust. Appendix B provides the correct language of SDAPCD Rule 55, including that vehicle speeds on unpaved roads during construction shall be "less than 15" miles per hour. Appendix B identifies compliance with Rule 55 as a Project Design Feature (PDF-AQ-1) to be complied with during project construction (Draft EIR Appendix B, p. 2). Revisions are shown in ~~strikeout~~/underline for Chapter 3, Project Description, and Section 4.2, Air Quality, of the Draft EIR (refer to Chapter 3, Errata, of the Final

EIR to clarify the project is required to comply with the SDPACD Rules specific to limiting dust during construction).

02-58 The commenter states that the project's dust control measures are only required for project construction although the portion of Guajome Lake Road south of Albright Street is unpaved and will continue to cause dust issues. The commenter is correct that PDF-AQ-1 applies only to project construction, consistent with the requirements of SDAPCD Rule 55. As stated in Draft EIR Chapter 3, Project Description, the project would pave the section of Guajome Lake Road over the length of the property frontage and west to connect with to Albright Street, approximately 1,200 linear feet. The segment of Guajome Lake Road southeast of the project site would remain unpaved. Refer to Response to Comment I2-5, addressing air quality impacts, in regard to dust concerns as a result of additional vehicle trips on the dirt road southeast of the project site. As detailed therein, the incremental increase in dust emissions from increased travel associated with the project on the remaining unpaved section would not result in a significant air quality impact. The project will also be required to pay thoroughfare and traffic fees totaling $300,128 (assuming current rate of $3,616/unit). This funding is intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process.

02-59 The commenter states the speed limit on Guajome Lake Road is not limited to 15 miles per hour to reduce dust on nearby sensitive receptors, including nearby playgrounds and Guajome Regional Park. No change to the existing 25 miles per hour (mph) speed limit on Guajome Lake Road is proposed. Refer to Response to Comment I2-5, addressing air quality impacts as a result of additional vehicle trips on the dirt road southeast of the project site. Travel along the unpaved section of Guajome Lake Road at the existing 25 mph speed limit and the associated dust emissions is an existing condition. The project would pave along approximately 1,200 linear feet of this road, which would incrementally reduce dust emissions, but would also incrementally increase daily traffic on the remaining approximately 800-foot length of unpaved section of the road southeast of the project site, which would incrementally increase dust emissions. As discussed in Response to Comment I2-5, the increase in dust emissions from increased travel on the remaining unpaved section would not result in a significant impact. See also Response to Comment O2-58, above.

02-60 The commenter states that SDAPCD dust/source control measures to address unpaved roads and windblown dust need to be included into the project design and conditions of approval. Please refer to Responses to Comments I2-5 and O2-57 through O2-59 above.

02-61 The commenter states there is a typographical error in Table 8 on page 33 of Appendix B regarding whether the project would exceed SDAPCD's volatile organic chemical (VOC) threshold. Table 8 in Appendix B identifies the criteria air pollutant emissions prior to mitigation. The inclusion of MM-AQ-1, which requires low VOC paints during construction and MM-AQ-2, which prohibits installation of wood burning stoves or fireplaces reduces the project's VOC emissions to below the SDAPCD threshold, making the impact less than significant. This typographical error is not a reflection of the analysis provided in Appendix B or the results of the computation provided in Appendix A, CalEEMod Output Files, of Appendix B, and does not indicate that the project would have a potentially significant impact that is not evaluated in the Draft EIR. For clarity, Table 8 of Appendix B has been revised to replace "No" with "Yes" to show the VOC threshold would be exceeded prior to mitigation, but less than

significant after mitigation is included. Revisions are shown in ~~strikeout~~/underline for Chapter 3 of the Draft EIR (refer to Chapter 3, Errata, of the Final EIR).

02-62 The commenter recommends the project be all-electric to reduce the use of fossil fuels, improve indoor air quality, and reduce construction costs. The Draft EIR evaluates the project as proposed, including the use of natural gas, and finds that with implementation of mitigation measures the project would not have any significant air quality or GHG impacts, such that no additional mitigation is required. This is not a comment on the adequacy of the Draft EIR. The commenter's recommendation is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-63 The commenter states that the Draft EIR does not identify conflicts with the appropriate air quality plan because it fails to account for projected housing growth by income level, asserts that the project is not consistent with the San Diego Association of Governments (SANDAG) growth projections, and states that the City is projected to exceed the target for above moderate housing. As discussed on page 4.2-19 in Draft EIR Section 4.2, Air Quality, based on SANDAG's most recent RHNA available during preparation of the Draft EIR, the City has a projected deficit of 1,268 very-low-income units, 718 low-income units, 883 moderate units, and 2,574 above-moderate income units. To meet SANDAG's regional housing requirements the City needs to build 5,443 units between 2021 through 2029. The project is expected to build 83 units, including 4 low-income units and 75 above moderate-income units, which would be within SANDAG's growth projections for housing during the 6th Cycle planning horizon (i.e., April 2021 – April 2029) (Draft EIR, p. 4.2-19). This is consistent with the analysis in Section 4.12, Population and Housing under Threshold a (Draft EIR, p. 4.12-9). Therefore, the Draft EIR accounts for environmental impacts associated with housing by income level as identified in the comment.

02-64 The commenter asserts that above moderate housing generates more GHG emissions than smaller units built for lower income levels and reiterates their assertion that the project is not consistent with SANDAG growth projections. Please see Response to Comment O2-63 regarding consistency with SANDAG growth projections. As noted in Draft EIR Chapter 3, Project Description, the four affordable housing units that would be constructed onsite are the same size as the market rate units. Draft EIR section 4.7, Greenhouse Gases, found that the project would generate less-than-significant levels of GHG emissions. The GHG analysis was based on modeling that includes consideration of the size of the residences and the associated vehicle traffic. Further, as previously mentioned, there is no distinction between the number of affordable and market rate units for the purposes of the modeling; therefore, no change is required.

02-65 The commenter states that the Draft EIR references the California Air Resources Board (CARB) 2008 Scoping Plan but should address CARB's 2022 Climate Change Scoping Plan because it provides more specific guidance for local jurisdictions. The commenter also states that the Draft EIR does not evaluate compliance with the goal identified in both the 2008 version and 2022 versions of achieving 6 metric tons of GHG emissions per capita by 2030 to meet the state's target of reducing GHG emissions by 2030 to 40% below the 1990 levels.

In response, as the lead agency, the City has the discretion to choose the significance threshold for discretionary projects. The City's Climate Action Plan (CAP) relies on a screening threshold based on land use size and a CAP (2019) Consistency Checklist to determine whether a project's emissions would be consistent with GHG emissions estimated within the City's CAP. Lead agencies under CEQA are not

required by CARB to use the goals set in the CARB Scoping Plan as the threshold of significance but are instead vested with the discretion to rely on the appropriate significance criteria or threshold recommended by the applicable air district or other lead agencies. Pursuant to CEQA Guidelines sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. As discussed in Section 4.7 Greenhouse Gases, the City of Oceanside has adopted a CAP, which was prepared in accordance with the requirements within CEQA Guidelines Section 15183.5 and was subject to environmental review. A plan for the reduction of GHG emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. The CAP demonstrates how the City will align with state GHG emissions reductions targets for 2020, 2030, 2035, 2040, and 2050. Projects consistent with the CAP, as shown through the City's Checklist, are consistent with the City's GHG reduction measures and, therefore, also align with state goals, plans, and policies. The proposed project demonstrates consistency with the CAP Consistency Checklist, as detailed in Section 4.7 of the Draft EIR, and would therefore result in less than significant impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As such, evaluating compliance with the CARB 2022 Climate Change Scoping Plan would not change the impact determinations in Section 4.7, which concluded that the proposed project would not generate GHG emissions that have a significant impact on the environment because the project was determined to be consistent with the City's CAP (Table 4.7-5); therefore, no change is required.

02-66 The commenter is unclear if the project is including natural gas fireplaces and if so, has the air quality modeling factored in natural gas fireplaces. In response, natural gas fireplaces are not proposed at this time. However, natural gas fireplaces were included in the air quality modeling conducted for the proposed project as shown in Appendix B. The discussion in Section 2.4.2.2 of Appendix B has been revised for clarity. Woodstoves and fireplaces would be prohibited per MM-AQ-2 not PDF-AQ-1. Appendix B has been revised to clarify the statements regarding natural gas fireplaces, as shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. The error is not a reflection of the analysis provided in Appendix B, or the results of the computation provided in Appendix A, CalEEMod Output Files, of Appendix B, and does not indicate that the project would have a potentially significant impact that is not evaluated in the Draft EIR. Therefore, this comment does not raise a substantive issue on the content of the Draft EIR.

02-67 The commenter references the discussion in Appendix B of housing needs and the project's consistency with SANDAG's regional growth forecast and states that the Draft EIR does not address the need for housing at various income levels and offers an opinion that the City has exceeded its need for above moderate-income housing and this project would not comply with housing goals because it would increase the City's excess of high cost housing. Please refer to Response to Comment O2-63, which addresses the City's regional housing requirements as set forth by SANDAG. There is no evidence that the City has exceeded or will exceed its RHNA target for above moderate housing units of 2,574 units. In the first three years of the RHNA cycle (2021-2023), 1,128 above moderate-income units were permitted and just 465 above-moderate units completed in the City (HCD 2025). This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-68 The commenter incorrectly asserts the Draft EIR does not include the CAP Consistency Checklist Please refer to Draft EIR Table 4.7-5, Climate Action Plan Consistency Checklist and Project Consistency, which includes the CAP Checklist items and the related project consistency analysis. The level of detail provided complies with the CEQA Guidelines and is sufficient to evaluate environmental impacts. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-69 The commenter asserts that use of the CAP Checklist to support CEQA analysis is only sufficient for projects that "meet one or more of specific locational criteria." The commenter does not reflect the full description of the CAP Checklist applicability. The CAP Checklist states, "The Checklist is available to projects that meet locational requirements that further the City's efforts to facilitate housing and employment growth in walkable, transit-served areas, *as well as* projects that either 1) conform to current land use and zoning standards or 2) involve uses that would generate less GHG emissions than those allowed under current standards" (emphasis added; City of Oceanside 2021, p. 3). As demonstrated in Draft EIR Chapter 3, Project Description, and Section 4.10, Land Use and Planning, the proposed project is consistent with the City's General Plan's land use designation and zoning for the project site. This is also reiterated in Draft EIR Section 4.7, Greenhouse Gases, and Section 2.5.1 of Appendix B. As such, the project is eligible for the CAP Consistency Checklist for assessment of GHG emissions impacts. In subsequent comments, the commenter introduces a list summarizing the locational criteria which and their conclusions on whether the proposed project meets each. Refer to Responses to Comments O2-70 through O2-72.

02-70 The commenter lists two of the locational criteria for CAP Consistency Checklist applicability and indicates they have concluded that the project does not meet either one. The commenter is correct that the proposed project would not be within a smart growth opportunity area or within ¼ mile of a priority Transit Oriented Design corridor. The Draft EIR does not assert that the project is in a location that meets either of these criteria; rather, the project is consistent with the land use designation and zoning for the site as discussed at Response to Comment O2-70, which enables it to use the Checklist to streamline review. No further response is required.

02-71 The commenter lists the third locational criterion for CAP Consistency Checklist applicability, which is consistency with the current land use and zoning designations and states their conclusion that the project does not meet this criterion because it is requesting a waiver of zoning conditions and has violated others that have not been properly identified. As discussed in Response to Comment O2-69, the project is consistent with the land use and zoning designations for the project site. Specifically, the site is designated in the General Plan Land Use Map and zoned for single-family residences and the project proposes to develop single-family residences. The CAP Consistency Checklist only requires consistency with the land use and zoning designations, not with overlay districts. This is because the GHG emissions projections in the CAP are based on the land uses anticipated to be developed in the City and are not influenced by development and design standards such as setbacks, retaining wall height, and parking ratios. Note that waivers from the overlay district development and design standards are identified in Draft EIR Table 3.3-1. In addition, a more detailed summary of project compliance with applicable development standards, including overlay district standards, has been added to Draft EIR Table 3.3-1, Text revisions to

Table 3.3-1 have been made in strikeout/ underline in Chapter 3, Errata, of this Final EIR. There is no request for a waiver from any of the Scenic Park Overlay District standards. Please also refer to Response to Comment O5-5 below, which describes the project's consistency with the Development Regulations set forth in Section 2204 of the Zoning Ordinance for the Scenic Park Overlay District.

O2-72 The commenter lists the fourth locational criterion and states that the Draft EIR did not claim the project would meet this criterion and did not conduct any analysis related to it. The commenter misstates this criterion. The first sentence of this criterion is "The project requires amendment of current land use and zoning designations" (City of Oceanside 2021, p. 4). Only if an amendment to the land use and zoning designations is required is a project to demonstrate reduced GHG emissions to demonstrate consistency with the locational criteria. As stated in Responses to Comments O2-69 and O2-71, the project is consistent with the land use and zoning designations for the project site. No amendment to the land use and zoning designations is proposed or required; thus, this criterion is not applicable to the project and no analysis pertaining to this criterion is required.

O2-73 The commenter states that the project is required to provide further GHG analysis because it is not eligible for the CAP Consistency Checklist for assessment of GHG emission impacts, and that would include a VMT analysis must be consistent with the City of Oceanside Traffic Impact Analysis Guidelines for VMT and LOS. Please refer to Responses to Comments O2-69 and O2-71 which demonstrate that the project is eligible for reliance on the CAP Consistency Checklist. Additionally, impacts related to VMT were analyzed consistent with the City's Traffic Impact Analysis Guidelines. Please refer to Draft EIR Section 4.17 and Appendices K and L which identify that the project is consistent with the General Plan land use and is calculated to generate 830 ADT. Because the project would not generate more than 1,000 ADT, which is the threshold for screening out established in the City's Traffic Impact Analysis Guidelines, the project is not required to conduct a detailed VMT analysis. The project is screened out of requiring a transportation VMT analysis and presumed to have a less than significant impact.

O2-74 The commenter requests that the project be all-electric with no natural gas infrastructure and that all Title 24 voluntary measures be included as part of the project.

Please refer to Response to Comment O2-62 regarding the suggestion that the project be all-electric and Response to Comment O2-29 regarding the suggestion that the project incorporate additional sustainability features. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

O2-75 The commenter requests that the project include a mechanism that ensures compliance with tree canopy and pervious surface requirements over the life of the project. Refer to Response to Comment O2-9 regarding long term compliance requirements under the Urban Forestry Program of the Landscape and Tree Canopy Management Plan, which states that compliance with Article 30, Section 3049 of the City's Code of Ordinances would be ensured through the City's standard Condition of Approval requiring the project to provide a Landscape and Tree Canopy Management Plan. The Landscape and Tree Canopy Management Plan is required to addresses regular, seasonal, and

emergency maintenance, trash abatement, irrigation, tree/plant care, tree replacement, insect and disease infestation prevention, integrated pest management, and appropriate response. Projects that do not maintain their landscape in a manner consistent with the approved Landscape and Tree Canopy Management Plan are subject to code enforcement action.

02-76 The commenter acknowledges the project meets the current minimum requirements for electric vehicle (EV) hookups/charging, but states that the EIR does not address the project's ability to accommodate increased EV usage compliance as the state transitions to all EVs and asserts that the GHG analysis should address this as part of the cumulative analysis.

As noted in Draft EIR Section 4.7, Greenhouse Gases, AB 1236, adopted in 2015, requires local jurisdictions to approve applications for the installation of EV charging stations unless the installation would have a specific, adverse impact upon the public health or safety that cannot be mitigated. Thus, it is likely that there will be an increase in private sector charging stations available over time. In addition, individual homeowners would have the ability to install charging infrastructure to be used within each single-family home's two-car garage and driveway. The analysis of the project's contribution to GHG emissions is addressed in Section 4.7 and found to be less than significant, such that no mitigation is required. As the vehicle fleet in the state shifts to an increased percentage of EVs, the generation of GHGs through mobile sources will be further reduced. Therefore, the analysis of the project's contribution to GHG emissions represents the worst- case scenario for GHG emissions because equipment and vehicle emission factors for later years would be reduced as the use of EVs increases.

02-77 The commenter introduces their concerns over the project's compliance with several provisions of the Oceanside Subarea Plan and states that the failure to comply would result in adverse impacts to biological resources. The City acknowledges this comment as an introduction the comments that follow. Please refer to O2-78 through O2-95 in which these comments are addressed. This comment does not specifically address the adequacy of the Draft EIR.

02-78 The commenter states that under the North County Multiple Habitat Conservation Program (MHCP), impacts to sensitive habitat outside of the development footprint are not allowed to accommodate FMZs, that there is no figure that shows where and to what extent the project would not meet the 30-foot width requirement of FMZ 1, and that Figure 3 shows a consistent 30-foot width for FMZ 1. Please refer to Response to Comment I7-2 which addresses FMZ widths.. In response, Figure 4 of Appendix O, of the Draft EIR, has been revised to depict the extent of the proposed FMZs (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

As stated in Draft EIR Section 4.3, Biological Resources, the project proposes to modify the current proposed preserve boundary to conform with the site design, preserving everything to the northeast of the proposed project and existing development as shown on Figure 3 in Appendix C. Further, please refer to Figure 7, Proposed Project Impacts to Biological Resources, of Appendix C, which illustrates the distribution of vegetation communities on the proposed project site and the extent of the proposed impacts. The design of the project would ensure that the general location, acreage, and vegetation originally planned for preservation in the Subarea Plan would remain with implementation of the proposed project.

Section 4.3.4 of the Draft EIR and Table 4.3-5, Project Overlap of Subarea Plan Buffers, describe that Section 5.2.4 of the Subarea Plan recommends a 50-foot-wide buffer biological buffer and a

50-foot-wide planning buffer (providing a total buffer width of 100 feet) from the southern edge of the riparian forest and southern willow riparian forest. The proposed project would overlap with 0.36 acres of the planning buffer (Table 4.3-5, Project Overlap with the Subarea Plan Buffers). Although the Subarea Plan is not currently adopted, the City encourages applicants to adhere to the Subarea Plan to the extent feasible, including no net loss of wetlands and the preservation of adequate buffers. Although the project would not provide the full 100-foot-wide buffer, project development has been sited to ensure all direct impacts to wetlands/riparian areas are eliminated. The remaining impacts to the buffers are required to meet the proposed project objectives, including development of housing units as authorized under Density Bonus Law, and ensure safety. Of the 0.36 acres of overlapping development, 0.17 acres overlaps with Zone 2 FMZ, which will require the thinning of 0.16 acres of coastal sage scrub vegetation (the remaining 0.01 acres includes developed areas). The FMZ has been revised to include alternative compliance methods in order to eliminate the need to conduct thinning within the disturbed riparian forest and reduce impacts to the biological buffer. The slope in the northwest portion of the site is at an elevation that requires creation of a manufactured slope extending into the planning buffer. Portions of the FMZ overlap this area; however, drought tolerant native species could be provided as part of the landscape as long as they meet the FMZ requirements. Therefore, although FMZ is not an allowed use within this buffer per the Subarea Plan (City of Oceanside 2010), 0.17 acres of Zone 2 FMZ could still serve to provide the buffer functions established by the Subarea Plan. In addition, fencing will be placed around the perimeter of the development to deter residents from recreating in the avoidance areas. The remaining impacts to the buffers are required in order for the project to meet its overall goals and objectives. Eliminating all development within the buffers would greatly reduce the developable acreage of the site and render the project infeasible from an economic standpoint (Draft EIR Appendix C, Biological Technical Report, p. 31). Implementation of MM-BIO-1 would provide compensatory mitigation to reduce direct, permanent impacts to non-native grassland and coastal sage scrub to less than significant. Further, per Subarea Plan requirements, all areas of non-native vegetation and developed areas within the buffer will be landscaped with native vegetation (MM-BIO-2). Impacts were accordingly found less than significant with mitigation incorporated regarding potential conflicts with a Habitat Conservation Plan.

02-79 The commenter requests clarification on what is “equivalent” off-site fuel modification and where it would occur. Equivalent off-site fuel modification refers to the fact that land adjacent to portions of the proposed development footprint consist of larger residential lots, roadways, or other disturbances that have reduced the fuels and are maintained and where no additional fuel modification is necessary. Thus, the conditions in these “equivalent” off-site FMZ areas already meet the standards and intent of the FMZs and contribute to ensuring adequate fire protection for the project (Draft EIR Appendix O, p. 24). Figure 4 of Appendix O. has been revised to depict the extent of the proposed FMZs (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

02-80 This comment suggests that the Draft EIR does not properly identify impacts to adjacent lands related to FMZ and that the Draft EIR should include an analysis of the 0.31 acres of off-site impacts identified in the Draft EIR that would affect biological resources in Guajome Regional Park. Off-site impacts are limited to developed and disturbed areas. Specifically, the 0.31 acres of off-site impact is limited to paving Guajome Lake Road along the project frontage and northwest to Albright Street, approximately 1,200 linear feet (Draft EIR, Table 4.3-4). No construction activity or fuel modification is proposed within Guajome Regional Park and the project would not result in any

direct impacts to the park. Refer to Response to Comment O2-79, which also addresses off-site areas associated with FMZs. Further, please refer to Figure 7, Proposed Project Impacts to Biological Resources, of Appendix C, which illustrates the distribution of vegetation communities on the proposed project site and the extent of the proposed impacts, including the 0.31 acres of urban/development and disturbed areas.

O2-81 The commenter suggests the Draft EIR does not provide a figure which depicts the proposed project's impacts on hardline preserve identified in the Subarea Plan. The comment further states that the project is not consistent with the Subarea Plan in relation to the hardline preserve protection requirements outline in the document.

Draft EIR Section 4.3.4 references Figure 3 of Appendix C and specifically states "The northern portion of the project site overlaps with a hardline preserve zone as defined within the Subarea Plan (as shown in Figure 3 of Appendix C)."

The Subarea Plan acknowledges that areas of designated preserve can overlap with private ownership; therefore, the boundaries of the preserve may be revised on a project-by-project basis (Draft EIR, p. 4.3-10). The EIR further states that development of the proposed project in the northern portion of the project site would overlap with 0.03 acres of a hardline preserve zone as defined within the Subarea Plan. The project proposes to modify the current proposed preserve boundary to conform with the site design, preserving everything to the northeast of the proposed project and existing development as shown on Figure 3 in Appendix C. As outlined in Section 4.3, Biological Resources, the project would be consistent with the biological resource avoidance and mitigation requirements set forth by this plan to the greatest extent feasible. The design of the project would ensure that the general location, acreage, and vegetation originally planned for preservation in the Subarea Plan would remain with implementation of the proposed project (Draft EIR, p. 4.3-23).

Please refer to Draft EIR Section 4.10, Land Use and Planning, for an analysis of the project's consistency with the MHCP and Subarea Plan, which has not been adopted by the City council, but is used as a guidance document for development projects. As outlined in Section 4.3, Biological Resources, the project would be consistent with the biological resource avoidance and mitigation requirements set forth by this plan to the greatest extent feasible. The design of the proposed project would ensure that the general location, acreage, and vegetation originally planned for preservation in the Subarea Plan will remain with implementation of the proposed project (Draft EIR, p. 4.3-23). Note that Table 4.10-1 of the Draft EIR (see Draft EIR Section 4.10, Land Use and Planning) has been revised to update some text in the consistency analysis discussion for Policy 6.7. Revisions to Draft EIR Table 4.10-1 are shown in ~~strikeout~~/<u>underline</u> in Chapter 3, Errata, of this Final EIR.

O2-82 The commenter states the project ignores the WLAs recommendation that mitigation occur on site, noting that on-site impacts have been substantially avoided but that the EIR does not explain how off-site mitigation would be equivalent to the recommended onsite mitigation. Please refer to Responses to Comments A3-12 and A3-13 for responses to comments related to mitigation proposed in an off-site area. The proposed off-site mitigation site is Quarry Creek, which is a preserve currently managed by San Diego Habitat Conservancy. As noted in Response to Comment A3-13, off-site mitigation at the Quarry Creek Mitigation Site has been identified in negotiations with permitting regulatory agencies as their preferred mitigation alternative.

02-83 The commenter states that there is no requirement for active management or monitoring of the preserved onsite sensitive habitat and no endowment to ensure that it would be protected in perpetuity. MM-BIO-7 identifies requirements for monitoring of biological resources during project construction. Please refer to Response to Comment I23-12, which explains that Draft EIR Section 3.2.5, Project Design Features, has been revised to include PDF-BIO-1, which notes that a wall would be constructed along the northern development perimeter where a slope will be created, fencing would be placed around the remaining interface between development and open space area to prohibit access to the preserved riparian area, and that the Home Owners Association (HOA) would be responsible for removing trash and prohibiting trespassing in the open space area. The sensitive habitat onsite is not currently managed or monitored. Since onsite preservation of habitat is not being utilized for mitigation purposes and there would be no ongoing encroachment or activity in the preserved habitat, the project would not directly affect this area and there is no need for management or monitoring. However, MM-BIO-11 requires that the project comply with all terms and conditions developed as part of the Section 10 consultation process with the U.S. Fish and Wildlife Service (USFWS) and the project's Habitat Conservation Plan, which may include active management or monitoring if USFWS determines this is necessary to protect federally listed species.

02-84 The commenter expresses concern that the project does not comply with the Subarea Plan buffer requirements and states the Draft EIR does not clearly show or explain where or to what extent the buffers are proposed to be reduced. The Draft EIR states, "The proposed project would overlap with 0.36 acres of the planning buffer (Table 4.3-5, Project Overlap with the Subarea Plan Buffers)" (Draft EIR, p. 4.3-22). Appendix C explains "of the 0.36 acres of overlapping development, 0.17 acres overlaps with Zone 2 FMZ, which will require the thinning of 0.16 acres of coastal sage scrub vegetation (the remaining 0.01 acres includes developed areas). The FMZ has been revised to include alternative compliance methods in order to eliminate the need to conduct thinning within the disturbed riparian forest and reduce impacts to the biological buffer" (Draft EIR Appendix C, p. 31). Refer to Responses to Comments O2-78 and O2-83, above.

02-85 The commenter references the landscaped manufactured slope proposed in the northwestern portion of the project development footprint, states that the Draft EIR does not fully identify, analyze, or mitigate for impacts to the buffers, and asserts that this remains a potentially significant impact. Refer to Responses to Comments O2-78 and O2-83, above. Draft EIR Section 4.3 explains that FMZ 2 extends into the area of the manufactured slope and that drought tolerant native species could be provided in this area as long as they meet the FMZ requirements which would allow for this area to provide the buffer functions established by the Subarea Plan (Draft EIR, p. 4.3-23). MM-BIO-2 requires that landscaping within the buffer areas consist of native species. The Draft EIR has thoroughly analyzed the direct and indirect impacts to special-status species and provided minimization and mitigation measures to reduce potential significant impacts to less than significant. Please refer also to Response to Comment A3-20, which states that FMZ are included in the impact analysis prepared in support of the EIR.

02-86 The commenter asserts that the correct mitigation ratio for occupied coastal sage scrub habitat is 3:1. Please refer to Responses to Comments A3-12 through A3-13 for response to these comments. As stated in Section 4.3, Subarea Plan Table 5-2, Mitigation Standards for Impacts to Natural Vegetation and Habitat, identifies a 2:1 mitigation ratio for impacts to coastal sage scrub in the Coastal Zone and Agency approved areas of the Off-site Mitigation Zone (Draft EIR, p. 4.3-

18). Off-site mitigation at the Quarry Creek Mitigation Site was negotiated with permitting regulatory agencies as their preferred mitigation alternative. Additionally, since there is no Implementing Agreement between the City and the wildlife agencies for the Oceanside Subarea Plan, the mitigation ratios provided in the plan are used as a guidance, and the City has discretion to define mitigation ratios for individual projects.

02-87 The commenter states that the Draft EIR has failed to discuss impacts to local wildlife movement corridors caused by the project. Please refer to Responses to Comments A3-15 and A3-16 regarding potential impacts on local wildlife movement.

02-88 The commenter states that the Draft EIR has failed to discuss how the project will impact future coastal California gnatcatcher dispersal, noting that this species has been observed in the onsite coastal sage scrub habitat. The commenter states that coastal California gnatcatcher can move through a landscape with patches of coastal sage scrub, based on line-of- site and other conditions. The commenter is concerned with how eliminating these coastal sage scrub (CSS) patches effect dispersal along the northern part of the site and asks what the distance between CSS patches along this riparian corridor is if those on the project site are impacted.

Further study of wildlife movement is not warranted for the following reasons: 1) The riparian corridor represents the primary wildlife movement potential, and it will not be directly impacted by the project; 2) a buffer is provided between the project and the riparian corridor; 3) the riparian corridor is not contiguous upstream or downstream of the project site. Therefore, wildlife movement is already limited; and 4) there is no Implementing Agreement between the City and the wildlife agencies for the Oceanside Subarea Plan, and no permitting agencies have requested a specific wildlife movement study beyond what is presented in the Biological Technical Report (BTR) (Appendix C). For these same reasons, reproductive suppression and/or population decline of a special-status species related to wildlife movement is unlikely to occur as a result of the project. Refer to Responses to Comments A3-15, A3-16, I14-5, and I27-5 regarding the Draft EIR analysis that demonstrates the project would not have a significant impact to coastal California gnatcatcher dispersal. In response to the commenters statement that California gnatcatcher can move through a landscape with patches of coastal sage scrub based on line-of-site and other conditions, the project will retain 0.95 acres of CSS within the open space. This will allow for gnatcatchers to continue to use the site for live in habitat and dispersal to other areas of habitat surrounding the site, especially along the proposed hardline preserve.

02-89 The commenter emphasizes the importance of the northern riparian area of the project site and refers to an attachment, the California Gnatcatcher Corridor Study Evaluation of the Northern Connector Through the Wildlife Corridor Planning Zone in the City of Oceanside CA. The proposed project site is located outside of the Wildlife Corridor Planning Zone designated by the Subarea Plan. The Draft EIR analysis in Threshold (d) of Section 4.3 concluded the proposed project would not result in the loss of wildlife corridors or habitat linkages. Please refer to Response to Comment A3-15 regarding wildlife corridors and Responses to Comments I14-5 and I27-5 regarding coastal California gnatcatcher dispersal.

02-90 The commenter requests information regarding the location of the Quarry Creek mitigation site and the number of available mitigation credits at that site. The commenter states that the project's direct impacts to coastal sage scrub and non-native grasslands are required to be mitigated within

the City's Wildlife Corridor Planning Zone. The project site is located outside of the Wildlife Corridor Planning Zone designated by the Subarea Plan (Draft EIR, p. 4.3-8). Subarea Plan Section 5.1.5, Habitat Conserved in Conjunction with Private Development, states "offsite conservation will be directed to the [Wildlife Corridor Planning Zone], Pre approved Mitigation Area or other Wildlife Agency-approved mitigation areas in the City" (City of Oceanside 2010, pp. 5-7 and 5-8). Refer to Responses to Comments A3-9 and A3-12 regarding the Quarry Creek mitigation site, which note that this off-site mitigation site was chosen as the preferred mitigation based on discussions with USFWS and California Department of Fish and Wildlife (CDFW). Thus, use of this mitigation site would be approved by wildlife agencies and therefore would comply with the Subarea Plan guidance about the location of off-site mitigation.

02-91 The commenter states that the requirement for the HOA to ensure no trespassing occurs in the preserved habitat and that the area is kept free of trash is not sufficient to protect the sensitive habitat. The commenter states that full edge effect conditions should apply to this area and be the responsibility of the HOA to monitor and enforce. Please refer to Response to Comment O2-83 regarding monitoring and management measures and potential requirements for the onsite preserved habitat and Response to Comment O2-92, below, addressing edge effects.

02-92 The commenter states that the Draft EIR did not consider indirect impacts to sensitive habitat as a result of operation of the project and the edge effect conditions from the MHCP need to be included as project condition to ensure that the impact of indirect effects is mitigated. The commenter provides standard edge effect conditions from the MHCP included as Attachment A, which has been reviewed in responding to this comment. The project already incorporates measures relevant to the project construction, design, and location to neutralize edge effects, which align with the commenter's suggestions. Please refer to Response to Comment A3-15, addressing the project providing an effective buffer to neutralize edge effects related to wildlife movement and human disturbance, as well as indirect impacts to sensitive habitat as a result of operation of the project. The project provides an adequate buffer between the development and the riparian corridor. As discussed in Draft EIR Section 4.3, the project design incorporates all of the 50-foot biological buffer discussed in the Subarea plan and incorporates the majority of the 50-planning buffer discussed in the Subarea plan. These buffers provide separation between the project site and sensitive habitat which greatly decreases the potential for edge effects to degrade the preserved habitat. Thus, the project's potential indirect effect on the preserved habitat is less than significant and it is not necessary to apply the MHCP edge effect conditions to the project. Also refer to Response to Comment A3-16, which explains that the proposed buffer, fully shielded lighting, perimeter fencing, and other project design features will minimize operational impacts. Further, the project would comply with many of the applicable edge effect conditions through existing mitigation measures and compliance with regulatory requirements. For example, edge effect conditions 1 through 14, 19, and 22 all pertain to construction and are already reflected in the Draft EIR mitigation measures and existing regulatory requirements. Condition 15 and 17 regarding limited human and pet access on the list is addressed through vegetation and fencing. In addition, a PDF-BIO-2 has been added to Draft EIR Chapter 3, Project Description, under Section 3.2.5.5 of the EIR that requires the HOA to establish an education program for homeowners regarding responsible pet ownership (i.e., encourages keeping pets indoors, especially at night; having pets neutered or spayed; belling of cats to reduce their effectiveness as predators; and prohibiting release of unwanted pets into the wild).

Edge effect condition 16 on the list provides standards to ensure artificial lighting spillover into preserved habitat is limited. Similar standards are required of the project and under Chapter 39 of the City of Oceanside Municipal Code. All outdoor lighting would be shielded and required to meet these standards, as explained in Section 3.2.2 of the Draft EIR. Condition 21 regarding avoiding attracting predators by keeping the site clean and keeping trash in enclosed containers is addressed at MM-BIO-6 during construction and compliance with City regulations during operation, which would include providing trash enclosures with adequate space for collection, storage, and separation of all recyclable materials in full compliance with City standards (see Section 4.17.4 of the Draft EIR).

Other of the suggested conditions are irrelevant to the project and would not be included. For instance, the commenter's suggested condition 27 to design utility lines to minimize harm to wildlife is inapplicable where utilities would be undergrounded with the project. In sum, the project has been appropriately designed and conditioned to minimize edge effects, which would be less than significant without incorporating additional conditions from the list provided at Appendix A of the commenter's letter.

02-93 The commenter suggests that MM-BIO-2 should include the list of plants that are locally invasive published by the San Diego Natural History Museum in addition to the Cal-IPC "Invasive Plant Inventory" list, which is already included in MM-BIO-2. The commenter does not explain why this is necessary. The California Invasive Plant Council is an industry-standard reference source for this topic that addresses locally invasive plants. This is not a comment on the adequacy of the Draft EIR, The commenter's recommendation is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-94 The commenter suggests that MM-BIO-11 illegally defers mitigation to future Section 10 consultation. The commenter notes their concern with MM-BIO-11 is because such consultations are not part of a public process and there is no opportunity for the public to evaluate whether any proposed modifications are sufficient to reduce impacts to biological resources to less than significant. The Section 10 consultation process is required after City consideration of the project for approval because the project would remove coastal sage scrub which could result in take of coastal California gnatcatcher (Draft EIR, p. 4.3-19). Refer to Response to Comment A3-23, which explains that MM-BIO-1 mitigates for impacts to Diegan coastal sage scrub at a 2:1 mitigation ratio and that ratios for habitat-based mitigation would be finalized during the Section 10 consultation process with USFWS. Thus, MM-BIO-1 sets the minimum mitigation ratio for the impacts to this habitat while MM-BIO-11 recognizes that additional mitigation requirements could be imposed by USFWS. Since USFWS is the regulatory agency with decision making authority over issuance of take permits and approval of any terms and conditions necessary to minimize impacts, USFWS approval of the Habitat Conservation Plan that would be developed through the Section 10 consultation process would be sufficient to ensure that impacts to federally listed species would be less than significant. Thus, with implementation of MM-BIO-1 through MM-BIO-11, impacts to biological resources would be reduced to less than significant and the proposed project would be in accordance with federal, state, and local regulations.

02-95 The commenter states that the Draft EIR did not identify the potential direct or indirect impacts to Guajome Regional Park from the modifications to Guajome Lake Road. The commenter asserts that the Draft EIR states that the realignment and widening of the road will impact the park and

states that the Draft EIR acknowledge this impact in a table but does not include a figure showing the potential impacts to Guajome Regional Park. The commenter is incorrect. The Draft EIR does not state that the improvements to Guajome Lake Road would affect the park. Off-site impacts from the improvement of Guajome Lake Road are limited to 0.31 acres of developed and disturbed areas (specifically the existing unpaved road and immediate shoulders, which are located outside of the park boundaries) as shown in Table 4.3-4 (Draft EIR, p. 4.3-5). Further, please refer to Figure 7, Proposed Project Impacts to Biological Resources, of Appendix C, which illustrates the distribution of vegetation communities on the proposed project site and the extent of the proposed impacts, including the urban/development and disturbed habitat adjacent to Guajome Regional Park.

02-96 The commenter requests that the project restrict construction to Monday through Friday and suggests Saturday construction should not be allowed because it is adjacent to a regional park. As stated in Draft EIR Section 4.11, Noise, all construction operations conducted on the premises, including the warming up, repair, arrival, departure, or running of trucks, earthmoving equipment, construction equipment, and any other associated equipment shall be limited to the period between 7:00 a.m. and 6:00 p.m. each day, Monday through Friday, and no earthmoving or grading operations shall be conducted on the premises on Saturdays, Sundays or legal holidays, unless waived by the City Engineer. Further, the project would be conditioned to comply with all applicable noise standards, including but not limited to, the pre-construction requirements listed in Draft EIR Section 4.11, Noise. This comment does not otherwise raise a substantive issue on the content of the Draft EIR and revisions to the Draft EIR are not necessary. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-97 The commenter expresses concern that Figure 2 in Appendix J, Noise Technical Report, does not consider off-site construction impacts (i.e., Guajome Lake Road improvements and 2,000 feet of sewer force main proposed within Guajome Lake Road) and requests off-site impacts be included in the analysis too. In response, Appendix J, Figure 1: Project Location, has been revised to depict the extent of the off-site construction (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Draft EIR Section 4.11, Noise, evaluated the potential for significant project construction noise impacts on the residentially zoned properties west and east of the project site at a distance of 40 feet. The proposed project's off-site improvements would involve comparable construction activities to what was studied for on-site construction; however, because the property line of the residential home to the west, north of the Guajome Lake Road (i.e., where the Guajome Lake Road would be paved toward Albright St.), and the property line of the residential homes near the intersection of Guajome Lake Road and Old Ranch Road (i.e., where the proposed sewer force main would connect to the existing public gravity sewer system) are less than 40 feet from the off-site construction, the off-site improvements would be closer to noise-sensitive receptors than what was evaluated in the Draft EIR . Therefore, clarifying text revisions have been made to Table 4.11-4 and 4.11-5 of Draft EIR Section 4.11, Noise, and Table 5 and 6 of Appendix J. These minor revisions have been made to reflect the estimated project construction noise levels during the building construction and paving phases at the nearest residences where trenching, utility installation, and paving associated with off-site improvements would occur. Revisions are shown in ~~strikeout~~/underline for Draft EIR Section 4.11, Noise, and Appendix J, in Chapter

3, Errata, of this Final EIR. These revisions fine tune analysis provided and do not change any impact conclusions or result in a new or more severe potentially significant impact compared to what was evaluated in the Draft EIR.

02-98 The commenter states that noise impacts of the proposed on-site sewer lift station were not evaluated. In response, the Draft EIR Section 4.11, Noise, evaluated long-term operation noise, including on-site mechanical equipment noise exposure, and concluded operational project noise impacts would be less than significant. The sewer lift station pump would be powered by a fairly small 8 horsepower (hp) motor and would be submerged in a wet well approximately 13 feet below ground surface. Under such conditions, noise levels from the operation of a sewer lift station would have negligible effects to existing noise-sensitive residential receptors; thus, operation of the private sewer lift station was not included in the outdoor sound propagation prediction model. The proposed project's on-site sewer lift station would not create additional long-term operational noise beyond what was studied in the Draft EIR. To clarify this within the EIR, text revisions have been made to Draft EIR Section 4.11, Noise. Revisions are shown in ~~strikeout~~/underline for Draft EIR Section 4.11, Noise, in Chapter 3, Errata, of this Final EIR. These revisions are minor and do not change any impact conclusions or result in a new or more severe potentially significant impact compared to what was evaluated in the Draft EIR.

02-99 The commenter notes that the project does not propose restrictions on the type of lawn equipment that can be used. The commenter requests that the Draft EIR include noise and GHG analysis and mitigation related to potential impacts from lawn equipment.. In response, the City does not impose any restrictions on the type or use of lawn maintenance equipment. However, the project would be required to comply with the provisions of Chapter 38 of the Oceanside Municipal Code which governs operational noise and contains the maximum 1-hour average sound levels for various land uses for operational noise (Table 4.11-2) generated by sources within or affecting each land use zone, as described in section 4.11.2 (Draft EIR, p. 4.11-5). Section 4.11, Noise, states that the new single-family homes and open space related to development of the project would add a variety of noise-producing electromechanical equipment. An analysis of this potential long-term operation noise was included in the noise analysis, starting on Draft EIR p. 4.11-11. The Draft EIR concluded project impacts related to long-term operation noise, attributable to noise-producing electromechanical equipment and other operational noise elements of the project, such as equipment for lawn maintenance, would be less than significant (Draft EIR, p. 4.11-12). Therefore, the Draft EIR evaluated the estimated potential project-generated operational noise impacts from lawn equipment. No significant noise impacts were identified; thus, no mitigation measures are required. In response to the commenter's concern regarding GHG, Appendix B states that CalEEMod Version 2020.4.0 was used to estimate potential project-generated operational GHG emissions from a variety of sources, including area sources including landscape maintenance. Therefore, the Draft EIR evaluated the estimated potential project-generated operational GHG emissions from landscape maintenance. The level of detail provided complies with the CEQA Guidelines and provide sufficient detail to evaluate environmental impacts. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-100 The commenter states that the project description in Appendix H, Preliminary Hydrology Study, is inconsistent with the project description in the Draft EIR Chapter 3, Project Description, because

Appendix H refers to the site as an existing vacant lot covered in natural vegetation while the Draft EIR acknowledges that the site supports a home and shed; additionally, the commenter asserts that most of the vegetation onsite is not natural. The commenter also notes that paving of Guajome Lake Road is characterized in the appendix as only occurring along the project frontage whereas the Draft EIR states that paving would extend to Albright Street (the commenter references page 17 of 390, which indicates that the statement being questioned appears in Appendix I, Storm Water Quality Management Plan); and the commenter references a statement that the majority of stormwater would travel south across Guajome Lake Road through culverts (the commenter references page 20 of 390, which indicates that the statement being questioned appears in Appendix I). The commenter states that the description of stormwater passing under Guajome Lake Road through culverts is not consistent with other information in Appendix H and Appendix I.

In response, Section 1.2, Existing Conditions, of Appendix H, Preliminary Hydrology Study, correctly describes the site as a primarily vacant parcel with a dirt driveway and structures and refers to some of the natural habitats located within the site. This description is consistent with the Draft EIR. In the context of a hydrology study, the reference to natural vegetation does not mean the vegetation is native, it only indicates that the site is generally covered in vegetation as opposed to predominantly supporting human-made features.

Appendix I contains page 4 of Form I-3B, which is titled "Site Information Checklist for PDAs" (where PDA means Priority Development Areas). This form does indicate proposed improvements to Guajome Lake Road, even though it does not mention improvements northeast of the project frontage. The distance between the project site's southwestern corner and Albright Street is approximately 200 feet and the project site frontage along Guajome Lake Road is approximately 1,000 feet. There would not be a substantial increase in stormwater runoff from the additional 200 linear feet of impervious surfaces. Thus, the description within the stormwater intake form is generally consistent with the proposed project and does not affect the analysis of the Draft EIR. In addition, project plans and stormwater management analysis within Appendix I clearly indicate the extension of Guajome Lake Road improvements to Albright Street.

Appendix H page 39 presents a figure titled "Plan View – Existing Hydrology Node Map." This map identifies two existing culverts that convey runoff from the project site under Guajome Lake Road – one near the southwest corner of the site and one near the southeast corner of the site. As described in the Draft EIR page 4.9-8, the project would have three discharge locations, which would remain the same as they are in existing conditions. The three discharge locations, or points of compliance (POCs), consist of POC 1, POC 2, and POC 3. POC 1 collects runoff from Basin PR-1 at the northwest corner of the site. POC 2 will collect flows at the southwestern corner of the site from two biofiltration basins that make up Basin PR-2. Both POC 1 and POC 2 would be piped under Guajome Lake Road, continuing to outlet at Guajome Lake (POC 1) and a pond east of Ozark Road (POC 2). POC 3 collects the remaining flows from the project site that flow east, and these flows will drain into an existing ephemeral stream that drains to the northwest to Guajome Lake. This is consistent with the response to the Form I-3B question regarding proposed grading and changes to site topography. Further, specifically, the bottom of page 17 in Appendix H states that in the post-project condition "historic drainage patterns will remain unchanged and the site will continue to direct the majority of runoff towards Guajome Lake Road and then into culverts on the south side of the road." This is consistent with the discussion of proposed stormwater management in

Draft EIR Section 4.9, Hydrology and Water Quality, which explains that the project proposes to construct two detention basins, one near the project site's southwest corner and one near the project site's southeast corner, to maintain peak flow rates at the pre-project level, and outflow from the basins would be directed to the existing culverts. Thus, Draft EIR Section 4.9 and appendices H and I are consistent with each other in describing that stormwater runoff from the developed area of the project site would be routed to the existing culverts.

For clarity, the description of existing hydrologic conditions at the project as stated on Draft EIR page 4.9-1 has been revised to state overland runoff flows from the northeast corner of the project site to the southwest toward Guajome Lake Road where runoff enters the existing storm drain system by culverts south of the road and the remaining overland runoff flows east, draining into an existing ephemeral stream that drains to the northwest. Revisions are shown in ~~strikeout~~/underline for Draft EIR Section 4.9, Hydrology and Water Quality, in Chapter 3, Errata, of this Final EIR. Revisions to the text regarding existing hydrologic conditions does not require any additional changes the Draft EIR.

02-101 The commenter implies that the hydrology technical studies, with regard to the Preliminary Hydrology Study (Appendix H) and the Storm Water Quality Management Plan (SWQMP) (Appendix I), provide unclear statements about existing conditions and asserts there is no historical discussion regarding site runoff in the project area.

As stated in Section 4.9, Hydrology and Water Quality, runoff on the project site primarily sheet flows to three discharge locations. These locations discharge off-site to two existing culverts under Guajome Lake Road and outlet at Guajome Lake, to a pond east of Ozark Road, and to an existing ephemeral stream that drains to the northwest to Guajome Lake. The Preliminary Hydrology Study in Appendix H presents both the methodology and the calculations used for the project site in both the pre-development (existing) conditions, and the post-development (proposed project) conditions produced by the 100-year, 6-hour design storm event. As further detailed in Appendices H and I (both updated in 2024), the project proposes three biofiltration basins for pollution treatment and hydromodification control. Further, the project site post-construction would have minimal risk of erosion given proposed landscape establishment and because transport of sediments downstream would be significantly reduced by means of pretreatment and on-site biofiltration basins. In summary, Appendix H and I may have some slight variations in language regarding existing conditions; however, these reports are consistent with the overall analysis provided in Draft EIR Section 4.9, Hydrology and Water Quality. Finally, a hydrology study needs to provide existing conditions and is not required to include discussion of previous hydrology or erosion in the project area. This comment does not otherwise raise a substantive issue on the content of the Draft EIR and revisions to the Draft EIR are not necessary. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-102 The commenter implies that the hydrology technical studies do not include a figure showing basin drainage post project. Appendix A, Hydrology Support Material, of Appendix H, Preliminary Hydrology Study, includes an Existing Hydrology exhibit which shows the existing (pre project) flow calculations, flow direction and discharge points. On the next page, a Proposed Hydrology Node Map is provided which shows how the project proposes to redirect flows and the amount of those flows. If peak runoff flows were unmitigated, the proposed condition would have greater flows than the existing condition.

However, as shown on page 19 of 20 (Appendix H), the proposed project would detain and treat flows and that is why the post-development flows are less than the pre-development flows in the mitigated condition. Please also refer to the conclusions of Appendix H, which summarize that the analysis concluded that the proposed detention basin would accommodate runoff generated in the proposed project conditions, mitigating peak flows to less than pre-development conditions at the appropriate points of discharge. Accordingly, the Draft EIR is accurate and no inconsistency or error in the Draft EIR has been identified.

02-103 The commenter suggests that there is no justification for the methodology in Appendix H related to the use of a coefficient of 0.35. In Response, please refer to Section 1.2, Existing Conditions of Appendix H, which states, "the area is generally categorized to have majority group D soils within the proposed disturbed limits," and, therefore, a runoff coefficient of 0.35 was used for the calculations for the existing site using the methodology described in section 3.1.2 of the San Diego County Hydrology Manual and the formula provided therein. The commenter appears to be misunderstanding the methodology for pre-project and post-project calculations. Please refer to the conclusions of Appendix H, which summarizes that the analysis concluded that the proposed detention basin would accommodate runoff generated in the proposed project conditions, mitigating peak flows to pre-development conditions at the appropriate points of discharge. This comment does not otherwise raise a substantive issue on the content of the Draft EIR and revisions to the Draft EIR are not necessary. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

02-104 The commenter suggests that boiler plate language was provided for structural best management practices (BMPs), and states that Appendix I includes an example of structural BMPs that are not specific to the project site. In response, please refer to the Proposed Hydrology Exhibit in Appendix H. The SWQMP (Appendix I) was prepared by experts based on requirements set forth in the Regional Water Quality Control Board's National Pollutant Discharge Elimination System MS4 Permit that covers the San Diego Region, using the template that was developed for and was accepted by City staff as compliant with the same. The image of a site that is not the project site mentioned in this comment is from the County's stormwater manual BMP Design Fact Sheets, Section E.12 BF-1 Biofiltration. The analysis in Appendix I, Appendix H, and Draft EIR Section 4.9 is all specific to the project site. Please refer to Section 4.9 of the Draft EIR, which states that two biofiltration basins are proposed on the project site to provide stormwater treatment for the pollutants discharged from the development. The project is required to maintain structural stormwater BMPs in accordance with the SWQMP Operations and Maintenance Plan and to provide documentation of annual maintenance verification to the City as required by the Regional MS4 Permit. This comment does not raise a substantive issue on the content of the Draft EIR. The comment has been noted for the record and revisions to the Draft EIR are not necessary.

02-105 The commenter suggests that there is an error is the Site Design BMP Checklist because it indicates arroyo willow riparian forest and coastal sage scrub on the northern portion of the site will not be impacted. The commenter suggests this is in conflict with Appendix C, which shows there are impacts to coastal sage scrub.

This comment addresses the BMP Checklist response to the Site Design Requirement SD-2 Conserve Natural Areas, Soils, and Vegetation, which is defined in the City of Oceanside BMP

Design Manual (City of Oceanside 2022). This Site Design Requirement recommends that natural areas and vegetation within a project site be conserved but does not mandate 100% conservation of such areas. The manual states that project applicants "shall consult the City for jurisdictional specific requirements for mitigation of removal of sensitive areas," which indicates that some loss of natural areas and vegetation is anticipated to occur. The comment is correct that the project would result in impacts to coastal sage scrub. Specifically, as acknowledged in Draft EIR Section 4.3, Biological Resources, and in Appendix C, the project would impact 1.25 acres of coastal sage scrub, while avoiding impacts to 0.95 acres. Impacts would be mitigated at a 2:1 ratio within an off-site mitigation site, Quarry Creek per mitigation measure MM-BIO-1. The BMP Checklist response in Appendix I does not state that all areas of arroyo willow riparian forest and coastal sage scrub would be avoided; it only states that the natural areas in the northerly portion of the site will be retained. Therefore, Appendices C and I are generally consistent in their description of proposed on-site areas to be conserved. This comment does not otherwise raise a substantive issue on the content of the Draft EIR and revisions to the Draft EIR are not necessary.

02-106 The commenter states that Guajome Lake road experiences washboard conditions from winter rains and states the Draft EIR fails to consider impacts of increased traffic on dirt roads with regards to erosion and supports paving the remainder of the road. In response, the comment addresses an existing condition located east of the project.

The project includes improvement of Guajome Lake Road consistent with City standards. As detailed in Section 4.15 of the Draft EIR, road improvements proposed as part of project development would include the paving of and realignment of Guajome Lake Road for the length of the project property frontage and extending northwest to connect to Albright Street, approximately 1,200 linear feet. The proposed improvements to Guajome Lake Road would reduce potential erosion on this portion of the road compared to the existing unpaved dirt road condition due to the stabilization from the introduced street improvements. Additionally, potential erosion impacts would be avoided by adherence to the erosion control standards established by the City's Grading Ordinance and through implementation of BMPs required by the stormwater pollution prevention plan (SWPPP) (refer to Section 4.9, Hydrology and Water Quality, for more information). The segment of Guajome Lake Road east of the project site would not be paved as part of this project. The unpaved segment extends approximately 0.1 mile to the east; beyond that point, Guajome Lake Road is paved. There are no drainages located downslope of the unpaved section of Guajome Lake Road. Thus, any erosion that occurs on this segment of the road would not contribute to adverse hydrology and water quality conditions.. The project will also be required to pay thoroughfare and traffic fees totaling $300,128 (assuming current rate of $3,616/unit). These fees are intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process.

02-107 The commenter suggests that the Draft EIR has not adequately assessed compliance with state and local requirements, including the City's Circulation Element, to consider "complete streets." The commenter provides a quote from the City Circulation Element that recommends transportation projects, new or retrofit, address safety, access, and mobility, as well as recognize pedestrian, bike, and transit modes. The project is a small land use development and not a transportation or a street design project. However, the project would be constructed per City standards and would improve

Guajome Lake Road as described herein and connect with existing facilities in its vicinity. As detailed in Section 4.15, road improvements proposed as part of project development would include the paving of and realignment of Guajome Lake Road for the length of the project property frontage and extending northwest to connect to Albright Street, approximately 1,200 linear feet. Additionally, road improvements would involve 40-foot-wide curb to curb improvements including a 5-foot-wide parkway and a 5-foot-wide sidewalk. The internal private road would be 28 to 32 feet wide with 5-foot-wide sidewalks. Pedestrian access within the site would be provided by 5-foot-wide sidewalks along the internal private loop. Sidewalks would also be constructed along the project frontage. Guajome Regional Park, which includes several different trails, is directly across Guajome Lake Road from the project site. The project area is provided with transit service via North County Transit District. There are 12 bus routes operated by North County Transit District in the City. The closest stations to the project site are the Santa Fe Ave and Darwin Drive Sprinter Stations located approximately 1.6 miles south of the project site. Bus stops are located along North Santa Fe Avenue, south of Guajome Regional Park The proposed project upgrades an existing condition, which is not compliant with state and local requirements to consider "complete streets."

02-108 The commenter asserts their opinion that the Draft EIR provides an unreasonable assessment of current and cumulative traffic impacts and states they were unable to find current traffic counts confirming existing conditions. The commenter also states that area residents have observed lots of cut-through traffic from schools and argues that while the project may not meet the nexus to pave the remainder of Guajome Lake Road, the City should consider this. In regard to cut-through traffic concern, please refer to Responses to Comments I2-10, 02-58, and 02-59 above.

02-109 The commenter suggests that the Draft EIR has not confirmed that the proposed roadway improvements would be consistent with the City's Circulation Element and quotes from Policy 3.7 of the Element. The comment expresses concern that the project will include a sidewalk on only one side of Guajome Lake Road and states that Policy 3.21 of the Circulation Element requires landscaping along redesigned roadways. Please refer to Section 4.10 which provides a summary of the proposed project's consistency with applicable General Plan goals and policies. Table 4.10-1 on page 4.10-33 of the Draft EIR specifically analyzes consistency with the City's Circulation Element. The project would be in conformance with all policies of the Circulation Element. As stated in Draft EIR Chapter 3, Project Description, and Section 4.15, Traffic and Circulation, project implementation would include improvements along the portion of Guajome Lake Road fronting the project site to the standards of a Collector Street to comply with circulation and fire code standards, where the area is not currently up to circulation or fire code standards. Please refer to Response to Comment A2-13, which notes that the project will be required to pay its fair share of thoroughfare and traffic fees which would be used to support any future City capital improvement projects, which could include a sidewalk on the southside of Guajome Lake Road or crosswalk. Section 3.2.1.3 of the Draft EIR also explains that landscaping would also be featured adjacent to public rights-of-ways.

02-110 The commenter provides a screenshot of the City's Street Design Criteria and states that it is unclear if the project meets all the City of Oceanside Street Design Criteria. Because the commenter does not elaborate further on this, it is unclear if the commenter is misunderstanding how to evaluate the proposed project's consistency with the City of Oceanside street design criteria or if they are unclear about the required project design details. The project has been designed to comply with applicable criteria for street design for the City of Oceanside for review and approval by the City's Engineers. The

City will review the project's relevant engineering and building plans, reports, and documents in the permitting process to confirm compliance with City Street Design Criteria standards. The comment does not raise any specific environmental issues related to the adequacy of the Draft EIR.

02-111 The commenter acknowledges that the project is requesting a waiver for Equestrian Overlay Zone standards but asserts that equestrian related requirements in the Circulation Element may be applicable. The commenter provides equestrian-related excerpts from Policy 6.2 and 6.11 of the City's Circulation Element and states that the Circulation Element specifically mentions safe crossing to Guajome Regional Park. The commenter states the project has not complied with these requirements.

As discussed in Draft EIR Section 4.10, Land Use and Planning, while the project would not provide equestrian facilities on site, it would not impact existing equestrian uses in the surrounding area. Further, the project would not result in the removal of any existing equestrian trails. In response, the project's consistency with the City's General Plan elements goals, policies, and objectives, specifically Section 6.2, Equestrian Facilities, Objective i and Policy 6.11, has been added to Table 4.10-1, City of Oceanside General Plan Consistency Evaluation (refer to update to Table 4.10-1 as shown in Chapter 3, Errata, of this Final EIR). The project would be in conformance with all applicable policies of the Circulation Element. Please refer to Response to Comment A2-12 for responses related to Guajome Regional Park trails. In regard to pedestrians or equestrians crossing Guajome Lake Road, please refer to Response to Comment A2-13.

02-112 The commenter suggests that the project has ignored applicable goals and policies of the Recreational Trails Element, which is a sub element to the City's Circulation Element, and refers to a goal and objective that address protection and maintenance of equestrian trails.

The project is not proposing equestrian facilities on site and would not impact or remove the existing equestrian uses and trails in the surrounding area.. There are no equestrian trails that cross the project site currently and no access point into the park immediately across from the project site; thus, there is no legal path of travel for equestrians to access Guajome Regional Park through this site and the proposed development would not impede equestrians from using existing access points. Therefore, Objective 6.1 and Goal 7 are not applicable to the proposed project and were not included in the Draft EIR because an EIR is not intended to be an exhaustive review of every aspect of the general plan, but rather a focused analysis of the project's potential environmental impacts in relation to the applicable policies. As such, the project would not conflict with or impede implementation of the Recreational Trails Element goals and policies. Refer to Response to Comment 02-111 regarding the project's consistency with the goals and policies within the General Plan Circulation Element.

02-113 The commenter suggests the Draft EIR failed to consider safety impacts of horses crossing Guajome Lake Road. The commenter is concerned with the existing and proposed conditions of Guajome Lake Road with regard to safe horse crossing and suggests that "unsafe conditions already exist on Guajome Lake Road since no actual horse crossings have been provided in spite of the number of horses accessing the park from the north side of Guajome Lake Road." The commenter also asserts horse crossing requirements were applied to a road extension project several years ago. Please refer to Responses to Comments 02-112 and A2-13 above. There are no existing established equestrian trailheads located directly adjacent to or south of the project frontage or

the proposed improvements to the segment of Guajome Lake Road so the assertion that horses would need access north of Guajome Lake Road to Guajome Regional Park in front of the project is incorrect. The proposed project would not include equestrian facilities. In addition, with no sidewalk proposed as part of this project on the south side of Guajome Lake Road project frontage and given the close proximity of existing trail entrances to Guajome Regional Park located approximately 0.25 miles from the project site, it would not be appropriate to propose a pedestrian crosswalk and/or a new trail connection for access to Guajome Regional Park along this segment of Guajome Lake Road as part of the proposed project. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

O2-114 The commenter suggests that the Draft EIR has not evaluated the proposed project's GHG impacts and its location within an area with high VMT. Please refer to Response to Comment O2-73 for responses related to VMT and GHG analysis.

O2-115 The commenter expresses concern with the Local Transportation Assessment for the project because it states the project will build missing sidewalks, but the project only proposes a single-sided sidewalk without sidewalk connections on either side of the road segment. The commenter also suggests that the Draft EIR's cumulative analysis fails to consider several roads in the area that have a single access to Guajome Lake Road, increasing intensity of traffic on those roads with project implementation. Refer to Response to Comment I1-2 for a summary of project-related traffic impacts assessed in the Draft EIR. In regard to proposed sidewalk concerns, refer to Response to Comment A2-13. In regard to bike lane concerns, refer to Response to Comment O2-32.

O2-116 The commenter requests verification that the applicant has coordinated with adjacent jurisdictions including both the City of Vista and County of San Diego as required. In response, please note that San Diego County, including the San Diego County Planning Department and Department of Parks and Recreation, as well as the City of Vista, including the City Manager, have been solicited for comment as they were included on the City's mailing list for noticing for the proposed project. The County of San Diego provided comments on the proposed project's Draft EIR, please refer to Comment Letter A2 and the associated responses above. The City of Vista did not provide any comments on the Draft EIR. Furthermore, note that under CEQA, LOS or other measures of vehicle capacity or traffic congestion (i.e., traffic delay) are no longer considered in evaluating whether a significant impact on the environment would occur; therefore, the LOS analysis referred to in the EIR and its Local Transportation Analysis (LTA) in Appendix K has been provided for informational purposes only. To account for potential increase in traffic along Guajome Lake Road, the LTA includes an analysis of cumulative projects in the vicinity. The information regarding approved and pending projects is obtained from adjacent jurisdictions at the time of preparation of the traffic assessment. There were no potential projects identified in the near term that that would add traffic to the segment of Guajome Lake Road near the project; therefore, a background growth assumption was applied to account for traffic increase in the area. As noted in Section 4.15, Transportation of the Draft EIR, under Threshold d, the paving of the road would result in temporary road closure during the paving process. The project would also be required to implement a traffic management plan to ensure proper emergency access to the project site and surrounding area during project construction.

Therefore, potential impacts during roadway construction would be addressed per City's requirements by implementing appropriate traffic control measures.

02-117 The commenter suggests the proposed project has not demonstrated compliance with Policies 1c-3 and 2c-4of the General Plan Energy and Climate Action Element (ECAE).

In response, project consistency with applicable ECAE policies are provided in Draft EIR Table 4.10-1, City of Oceanside General Plan Consistency Evaluation, and Section 4.2, Air Quality.

ECAE Policy 1c-3 states "Develop outreach and educational materials promoting energy efficiency and conservation that can be distributed to new homeowners and new businesses at point of sale." Policy 1c-3 is intended to incorporate the concept of sustainability into the City's community engagement efforts for department-level budgeting and program development in order to promote City outreach and environmental campaigns to educate residents, businesses, and visitors. Therefore, Policy 1c-3 is not applicable to the proposed project and was not included in the Draft EIR because an EIR is not intended to be an exhaustive review of every aspect of the general plan, but rather a focused analysis of the project's potential environmental impacts in relation to the applicable policies.

The City's ECAE aligns with the City's existing General Plan elements. The land use and transportation-related policies of the ECAE, such as ECAE Policy 2c-4, echo Land Use Element policies that call for "consistent, significant, long-term preservation and improvement of the environment" and the maintenance of a "safe, attractive, desirable, and well-balanced community." One of the key linkages between the ECAE and the Land Use Element is for the City to advocate for compact in-fill development that reduces sprawl and dependency on the automobile, including policies that encourage the placement of housing in close proximity to employment opportunities, commercial goods, public transit, and recreational facilities. The proposed project meets this goal. ECAE Policy 2c-4 states, "Ensure that capital improvements are consistent with the City's Complete Streets policies, as articulated in the Circulation Element." The proposed project upgrades an existing condition, which is not compliant with state and local requirements to consider "complete streets." The project will be required to pay its fair share of thoroughfare and traffic fees, which are intended to fund future City capital improvement projects. Allocation of these funds may include improvements to Guajome Lake Road, contingent upon the City's determination of need and prioritization through its capital improvements planning process. Therefore, Policy 2c-4 is not applicable to the proposed project and was not included in the Draft EIR because an EIR is not intended to be an exhaustive review of every aspect of the general plan, but rather a focused analysis of the project's potential environmental impacts in relation to the applicable policies. See Responses to Comments 02-107, 02-109, 02-111, and 02-112 above regarding project consistency with the Circulation Element policies.

02-118 The commenter suggests construction energy impacts of off-site improvements were not evaluated in the Draft EIR. In response, in Draft EIR Section 4.5, Energy, the analysis assumes off-site improvements would be constructed concurrently with the on-site work. Therefore, construction of the off-site improvements would not involve more energy consumption during construction than what was disclosed in Draft EIR Section 4.5 Energy, as shown in Table 4.5-1 and 4.5-2 (Draft EIR, p. 4.5-9).

02-119 As relates to the energy analysis in the Draft EIR, the commenter suggests that the Draft EIR has not evaluated the proposed project's GHG impacts and has not provided the required VMT analysis.

The comment also suggests that there is no analysis of consistency with zoning requirements. Please refer to Responses to Comments O2-69 and O2-71 which demonstrate that the project is eligible for reliance on the CAP Consistency Checklist. Please also refer to Response to Comment O2-73 for discussion related to VMT and GHG analysis. Project consistency with zoning requirements is discussed in Draft EIR Section 4.10, Land Use and Planning, and Response to Comment O2-40 above.

O2-120 The commenter states that the Draft EIR has falsely claimed it is eligible for an exemption from further analysis of GHG and that further analysis, as described in the CAP, is required in order to determine that there are no significant GHG impacts. Please refer to Response to Comment O2-119 above.

O2-121 The commenter suggests the project would include substantial use of natural gas and is not in compliance with the 2022 CARB Scoping Plan. Further, the commenter suggests there are issues with the CAP Checklist completed for the project. The commenter states that the 2022 CARB Scoping Plan includes measures for decarbonization of residential and commercial buildings and the standard for residential land uses is "all electric appliances by 2026." The commenter asserts that the project will not be operational until 2027 and should comply with this standard. As discussed in Response to Comment O2-65 above, CEQA Lead Agencies are not required by CARB to use the goals set in the CARB Scoping Plan as the threshold of significance but are instead vested with the discretion to rely on the appropriate significance criteria or threshold recommended by the applicable air district or other lead agencies to demonstrate compliance with state emissions targets. The project's demonstrated compliance with the City's CAP shows it will result in less than significant impacts related to GHGs and will not result in potentially significant effects related to the inefficient, wasteful, or unnecessary consumption of energy resources.

O2-122 The commenter suggests there are inconsistencies in regard to the description of direction of existing surface drainage between the preliminary Geotechnical Evaluation (Appendix G) and Preliminary Hydrology Study (Appendix H) prepared for the project. The preliminary Geotechnical Evaluation (Appendix G) states, "Surface drainage is directed toward the southwest and northeast on their respective ridge sides." The commenter suggests that the Preliminary Hydrology Study (Appendix H) states the majority of the drainage is to the southeast, across Guajome Lake Rd. As stated in Draft EIR Section 4.9, Hydrology and Water Quality, the analysis is based on Appendix H (Hydrology Report) and Appendix I (SWQMP). The geotechnical analysis was not used to evaluated site hydrology. Appendix H is correct in that the majority of the surface drainage is to the southeast; however, some surface drainage is directed toward the southwest and northeast on their respective ridge sides (refer to Appendix H page 39 for a figure titled "Plan View – Existing Hydrology Node Map"), consistent with Appendix G. While the two reports may have used different terminology and described surface drainage differently, there is no inconsistency resulting in a new impact that has not been analyzed in the Draft EIR. Site Drainage is discussed in Section 3.2.4 (Draft EIR, p. 3-6). In addition, refer to Sections 4.9, Hydrology and Water Quality, and 4.17, Utilities and Services Systems, for a detailed description of stormwater and drainage.

O2-123 The commenter asserts that the Geotechnical Evaluation (Appendix G) notes sewer utilities have not yet been designed and that future details would require further review to ensure BMPs are not within 10 feet of sewer utilities. The commenter states further analysis of this is needed based on the design of the sewer system shown in Appendix N, Sewer System Analysis.

As shown in Appendix N, the sewer system would consist of sewer lines placed beneath the interior loop road within the project site which would connect to the sewer lift station in the southwest corner of the site. Stormwater detention basins are proposed in the southwest and southeast corners of the site; additional stormwater BMPs would be designed and located during preparation of the SWPPP. Section 5.3.1.6 of the Geotechnical Report discusses placement of the proposed infiltration basins (which are referred to in the Draft EIR as detention basins) within 10 feet of a sewer line. The report notes that there is a proposed basin within 10 feet of a street, but that sewer lines are not always along the centerline of a street. As design of the sewer system and stormwater BMPs progresses, the project design team would ensure adequate separation between these facilities. The proposed interior roads would have widths ranging from 28 to 32 feet. Thus, there is sufficient space within the road width to ensure that sewer lines are at least 10 feet away from the detention basins. The level of detail provided in the Draft EIR complies with the CEQA Guidelines is sufficient to evaluate the project's environmental impacts, including consideration of stormwater BMPs and onsite utility infrastructure and revisions to the Draft EIR are not necessary.

02-124 The commenter suggests that the Draft EIR failed to identify the need to comply with geotechnical recommendations or the need for further review. As stated in Draft EIR Chapter 3, the project would be required to comply with the recommendations of the Geotechnical Report as a condition of approval (Draft EIR, p. 3-7). The Preliminary Geotechnical Evaluation (Appendix G) includes project design recommendations pursuant to the California Building Code and the City of Oceanside Grading Ordinance. These recommendations are specified in Appendix G, Section 5. In summary, the recommendations pertain to earthwork, foundations and slab design, lateral earth pressures and retaining wall design, geochemical considerations, concrete flatwork, preliminary pavement design, infiltration BMPs, control of groundwater and surface waters, construction observation, and plan review. Please refer to Draft EIR Section 4.6, Geology and Soils. for discussion of the Geotechnical Report and a detailed analysis of potential project impacts related to geology and soils.

02-125 The commenter states it is unclear if additional water service demand has been included for fire sprinkler system in each residential unit. A fire sprinkler system does not create additional daily demand for water service and thus the maximum and peak water demands for the project do not include water that may be used by the fire sprinkler systems. Instead, the fire sprinkler systems are evaluated in the context of the fire flow requirements established in the City's Water, Sewer, and Recycled Water Design & Construction Manual (City of Oceanside 2017). As shown in Appendix M, Water System Analysis, Sections 2.2 and 2.3 of the manual establish a minimum residual water pressure standard that must be attained when both the full fire flow water demand and the maximum day domestic water demand are modeled (Appendix A to Appendix M, pp. 2-2 and 2-3). As stated in Section 4.17, Utilities and Services Systems, modeling of the maximum day demand and fire flow shows that water pressure would exceed the minimum requirements and the water distribution system would be adequate to serve the needs of the proposed project (Draft EIR, p. 4.17-9).

02-126 The commenter states that it is unclear what waterline connections would be public or private and requests a summary of infrastructure additions and the costs of their construction and on-going maintenance that will be paid for by the taxpayers of Oceanside, and not the project developer. As stated in Section 4.17, Utilities and Services Systems, the onsite 8-inch water mains would be part of the public water system while the 1-inch water service line for each residence would be private

(Draft EIR, p. 4.17-9). CEQA does not require evaluation of fiscal or economic effects of a project, including costs associated with maintenance of public infrastructure. However, for informational purposes it is noted that the project developer will be responsible for construction of the infrastructure needed to serve the project and the City's acceptance of the infrastructure into the public system will be contingent on the infrastructure being constructed in compliance with the City's standards, which would ensure that maintenance needs and associated costs are commensurate with those of the existing public water system.

02-127 The commenter states that impacts related to the proposed sewer system extension have not been evaluated in the Draft EIR, noting that the off-site 2,000-foot sewer line is not reflected in Draft EIR Figure 3-2 and is not addressed in the analysis of construction air quality impacts or in any other potential impacts.

Draft EIR Chapter 3, Project Description, Section 4.17, and Appendix N identify that the project would involve construction of approximately 2,000 linear feet of a 3-inch force main sewer line along Guajome Lake Road between the project site and Old Ranch Road. Appendix N also includes graphics of the proposed force main. The narrative and figures in these EIR sections and appendix support the Draft EIR's good faith effort at full disclosure of the project's potentially significant impacts related to the proposed sewer system under CEQA. Please refer to discussion and exhibits in Appendix N and discussion in Draft EIR Section 4.17, Utilities and Services Systems, for a detailed description, graphics, and analysis of the proposed project's sewer system. In addition, construction of the off-site sewer force main was anticipated and evaluated in several sections of the Draft EIR and associated technical appendices.

For clarity and additional specificity regarding this improvement, revisions have been made to text and figures in Draft EIR sections and technical appendices, as shown in ~~strikeout~~/underline in Final EIR Chapter 3, Errata, and in Attachment A, Figure Revisions to the Draft EIR. In summary these revisions include:

Draft EIR Figures. Figures 3-1 and 3-2 have been revised to identify the location of the off-site sewer force main.

Section 4.2, Air Quality. Text was added to Draft EIR pages 4.2-20 and 4.2-21 clarifying that construction activity associated with the off-site sewer force main is included within the building construction phase. Thus, the air quality impact analysis in the Draft EIR includes the air pollutant emissions associated with construction of the off-site sewer line.

Section 4.3, Biological Resources. Table 4.3-1, Vegetation Communities and Land Covers, and Table 4.3-4, Permanent Impacts to Vegetation Communities and Land Covers, were revised to include the area that would be affected by the off-site sewer line. Text was also added to page 4.3-6 noting that the sewer line construction would occur within the existing right-of-way for Guajome Lake Road, which is identified as being within the urban/developed land cover type and text on page 4.3-19 that summarizes direct impact acreages was revised to include the area affected by the off-site sewer line. As noted in that discussion, "off-site impacts are limited to developed and disturbed areas" (Draft EIR, p. 4.3-19). Thus, construction of the off-site sewer line would not have any direct impacts to special status plant or wildlife species or sensitive vegetation communities.

Section 4.4, Cultural Resources. Text has been added to page 4.4-1 identifying the area affected by off-site improvements and noting that these areas have been previously disturbed or developed. In addition, text that erroneously stated the project site was recently affected by construction staging for the Sprinter line has been omitted. The areas that would be affected by off-site improvements have no greater potential to support cultural resources than the project site and all mitigation measures identified in Section 4.4 would apply to the off-site improvement work. Thus, construction of the off-site sewer line would not result in any new or more severe impacts to cultural resources than those identified in the Draft EIR.

Section 4.5, Energy. Text was added to Draft EIR pages 4.5-8 and 4.5-9 clarifying that energy consumption during construction activity associated with the off-site sewer force main is included within the building construction phase. Thus, the energy impact analysis in the Draft EIR includes the energy consumption associated with construction of the off-site sewer line.

Section 4.6, Geology and Soils. Text was added to Draft EIR page 4.6-4 to identify the off-site improvements included in the proposed project and text was added to Draft EIR page 4.6-10 to clarify that there are no records of paleontological resources within the areas that would support the off-site improvements. The areas that would be affected by off-site improvements have no greater potential to support paleontological resources than the project site and all mitigation measures identified in Section 4.6 would apply to the off-site improvement work. Thus, construction of the off-site sewer line would not result in any new or more severe impacts to paleontological resources than those identified in the Draft EIR.

Section 4.7, Greenhouse Gases. Text was added to Draft EIR page 4.7-22 clarifying that GHG emissions that would be generated by construction of the off-site sewer force main is included within the building construction phase. Thus, the GHG impact analysis in the Draft EIR includes the GHG emissions associated with construction of the off-site sewer line.

Section 4.11, Noise and Vibration. Refer to Response to Comment O2-97 regarding additional analysis of the noise impacts related to the off-site sewer line. As noted in that response clarifying text revisions have been made to Draft EIR Tables 4.11-4 and 4.11-5 to reflect the estimated project construction noise levels during the building construction and paving phases at the nearest residences where trenching, utility installation, and paving associated with off-site improvements would occur. These revisions fine tune analysis provided and do not change any impact conclusions or result in a new or more severe potentially significant impact compared to what was evaluated in the Draft EIR.

Section 4.15, Traffic and Circulation. Text was added to Draft EIR pages 4.15-10, 4.15-11, and 4.5-17 identifying the off-site improvements. The discussions of thresholds a and d note that the project would be required to implement a traffic management plan as a condition of approval to ensure proper emergency access to the project site and surrounding area during project construction. This requirement would apply to construction of the off-site improvements, which would involve comparable construction activities to what was studied for on-site construction; therefore, construction of the off-site sewer force main would not create new or more severe temporary impacts related to traffic and circulation than those evaluated in the Draft EIR

Section 4.16, Tribal Cultural Resources. Text has been added to page 4.16-1 identifying the area affected by off-site improvements and noting that these areas have been previously disturbed or

developed. In addition, text that erroneously stated the project site was recently affected by construction staging for the Sprinter line has been omitted. The areas that would be affected by off-site improvements have no greater potential to support tribal cultural resources than the project site and all mitigation measures identified in Section 4.16 would apply to the off-site improvement work. Thus, construction of the off-site sewer line would not result in any new or more severe impacts to tribal cultural resources than those identified in the Draft EIR.

Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report. Construction activities related to the off-site sewer line were included in the air quality and GHG modeling assumptions for the building construction phase. For clarity, the narrative and Figures 1 and 2 in Appendix B have been revised to identify the off-site sewer line construction as part of the proposed project.

Appendix C, Biological Resources Technical Report. Figures 1 and 2 have been revised to identify the location of the off-site sewer line. Table 2, Vegetation Communities and Land Covers, and Table 5, Permanent Impacts to Vegetation Communities and Land Covers, were revised to include the area that would be affected by the off-site sewer line. Text was also added to page 18 noting that the sewer line construction would occur within the existing right-of-way for Guajome Lake Road, which is identified as being within the urban/developed land cover type and text on page 24 summarizing direct impact acreages was revised to include the area affected by the off-site sewer line construction.

Appendix D, Cultural Resources Inventory Report. A narrative of the off-site sewer line has been added to Appendix D and Figures 1 and 2 in this appendix have been revised to show this off-site improvement. The areas that would be affected by off-site improvements have no greater potential to support cultural resources than the project site and construction of the off-site sewer line would not result in different impacts to cultural resources than those identified in Appendix D or require any additional management recommendations.

Appendix F, Paleontological Resources Inventory Report. A narrative of the off-site sewer line has been added to Appendix F and Figures 1 and 2 in this appendix have been revised to show this off-site improvement. The areas that would be affected by off-site improvements have no greater potential to support paleontological resources than the project site and construction of the off-site sewer line would not result in different impacts to paleontological resources than those identified in Appendix F or require any additional management recommendations.

Appendix J, Noise Technical Report. Refer to Response to Comment O2-97 regarding additional analysis of the noise impacts related to this sewer line extension. As noted in that response Figure 1: Project Location in Appendix J has been revised to depict the extent of the off-site construction and Tables 5 and 6 have been revised to reflect the estimated project construction noise levels during the building construction and paving phases at the nearest residences where trenching, utility installation, and paving associated with off-site improvements would occur.

O2-128 The commenter notes that the on-site sewer lift station is identified as private and asks what enforcement mechanism there is for ensuring that the HOA manages any private sewer system component in perpetuity. As stated in Section 4.17, Utilities and Services Systems, all on-site sewer facilities for the project are proposed to be private. The system would consist of 8-inch sewer mains and 4-inch laterals to serve each individual house, in addition to the lift station (Draft EIR, p. 4.17-10). The City's Water, Sewer, and Recycled Water Design & Construction Manual (City of Oceanside 2017)

requires that private sewer systems be "governed by and permitted through the Water Utilities Department" and identifies that the Engineering Department will conduct all inspections of private sewer systems. These requirements would be documented in the development's covenants, conventions, and restrictions (CC&Rs) so that the HOA is responsible for management of private sewer system component in perpetuity

02-129 The commenter states that Appendix O provides a description of the project that is inconsistent with Draft EIR Chapter 3 regarding the proposed number of dwelling units, and that the lack of a consistent description makes it difficult to determine if the proposed alternative mitigation with respect to FMZs is adequate. In addition to the discrepancy in the number of residential units, the commenter notes four specific concerns with Appendix O:

1. The commenter states that text in Figure 3 indicates FMZ 1 is between 0 and 30 feet wide, but no area is shown as being 0 feet in width.
2. The commenter states that text in Figure 3 indicates FMZ 2 is 30 to 70 feet wide, but many areas appear to be less than 30 feet wide.
3. The commenter states that Appendix O and the landscaping plan do not discuss or indicate the FMZ located between 0 and 5 feet from building foundations, which is described in Draft EIR Section 4.18 Wildfire as the area where requirements regarding irrigation, limited plant use, and plant height would apply. The commenter requests that all related figures include a consistent description of all of the FMZ requirements including this 0 to 5-foot zone, and requests that the EIR include provisions for enforcement for the FMZ requirements.
4. The commenter is not aware of HOAs or the OFD having inspection programs that review the 0 to 5-foot zone for compliance.

The project description in Appendix O has been revised to be consistent with Draft EIR Chapter 3, Project Description, as shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR.

With respect to FMZ 1, the labeling on Appendix O, Figure 3 indicates that this zone includes all areas that are within 30 feet of a building, rather than indicating that the zone may be limited to zero feet in width as suggested by this comment. This is made clear in the text in Section 3.11.2 of Appendix O, which states that the project's "defensible space consists of a combination of an irrigated, well-maintained landscape that consists of fire-resistant plants within 30 feet of the building (Zone 1) and a thinned landscape in the areas between 30 and 100 feet (Zone 2) from the structures (where applicable)" (Draft EIR Appendix O, p. 23).

With respect to FMZ 2, the labeling on Appendix O, Figure 3 does not show a width of 30 to 70 feet; it shows that FMZ 2 includes the area between 30 and 100 feet from each building, consistent with the description on Appendix O page 23. The comment is correct that the proposed FMZ 2 for this project does not fully meet the typical 30 to 100 feet standard. Appendix O states "the FMZs proposed for portions of this project are not standard OFD widths as some areas include reduced Zone 1 and/or Zone 2 areas and are less than 100 total feet within the property" (Draft EIR Appendix O, p. 24).

The proposed widths of the FMZs are shown on Appendix O Figure 4 which has been revised to depict the extent of the proposed FMZs (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR).

FMZ 1 is shown as being 30 feet wide around most of the project site, reducing to 20 feet along a portion of the site's eastern boundary. The width of FMZ 2 varies to a larger extent than FMZ 1. Along the project site frontage on Guajome Lake Road, FMZ 2 includes any land between the outer edge of FMZ 1 and the road; while the road itself constitutes an Off-site Equivalent Fuel Modification Area because there is no vegetation within the road. The Off-site Equivalent Fuel Modification Area also extends into Guajome Lake Regional Park where vegetation consists of low growing shrubs and no trees are present. On the project site's eastern side, FMZ 1 extends to the site boundary. Appendix O Figure 4 shows an Off-site Equivalent Fuel Modification Area extending up to 80 feet into the adjacent property, which Appendix O notes is a large residential lot where fuels have already been reduced and the landscape is maintained, "thus providing an equivalent FMZ" (Draft EIR Appendix O, p. 24). Similarly, on the western side of the site FMZ 2 has a maximum width of 13 feet, while the Off-site Equivalent Fuel Modification Area extends up to 70 feet into the adjacent large lot residential properties where fuels have been reduced, and the landscape is maintained in accordance with OFD requirements. Finally, on the north side of the proposed development area, FMZ 2 is shown as attaining the full 70 feet in width for much of the site with a reduced width in a small section towards the western side. This reduced width is necessary to protect biological resources. Refer to Response to Comment O2-79 for additional explanation regarding the off-site equivalent FMZs.

Section 3.14 of Appendix O explains the maintenance and inspection requirements for both FMZs. It establishes that vegetation management within common areas would be the responsibility of the HOA and that the HOA must ensure "long-term funding and ongoing compliance with all provisions of" Appendix O, enforce landscape requirements annually, retain a qualified wildland–urban interface (WUI) FMZ inspector to assess the FMZs and prepare a report for submittal to the OFD, and ensure that vegetation management is completed annually no later than June 1st of each year and more often if required by the OFD for fire safety (Draft EIR Appendix O, p. 26). This section also establishes that homeowners would be responsible for maintenance within FMZ 1 as well as the area between 0 and 5 feet from their home's exterior walls (this area is referred to as FMZ 0) and that these requirements would be documented in the development's CC&Rs. As noted in Response to Comment O2-11, inclusion of an FMZ 0 is a recommendation for properties in the very high fire hazard severity zone and not a requirement; and as noted in Response to Comment I7-13, the project site is not located within a very high fire hazard severity zone. Further, neither OFD nor CAL FIRE have adopted regulations or provided specific guidance that restrict plantings. However, the project incorporates an FMZ 0 as recommended by the Fire Protection Plan (FPP). Revisions to Section 4.17, Wildfire, and Appendix O to clarify the FMZ maintenance requirements are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. This includes addition of a project design feature, PDF-WF-3, regarding maintenance and inspection of FMZs.

O2-130 The commenter states that text is missing from the end of Appendix O's Water Supply Section. The comment is correct that Appendix O contained a sentence fragment. This fragment has been removed as shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. The remaining text within the water supply discussion provides a full description of the proposed water supply and water pressure adequacy.

O2-131 The commenter states that Appendix O includes language related to horse trailers or equestrian areas. The text in Appendix O regarding horse trailers and equestrian areas has been removed.

Revisions to Appendix O are shown in ~~strikeout~~/underline as shown in Chapter 3, Errata, of the Final EIR. Removal of the text regarding horse trailers and equestrian areas does not require any additional changes the Draft EIR.

02-132 The commenter notes that Appendix O mentions space for horse trailer parking and states that the project description does not identify parking for visitors, deliveries, and other non-residents. The commenter also states that areas where parking is restricted should be identified on Figure 2. As stated in Response to Comment O2-131, text in Appendix O regarding horse trailers has been removed, as shown in Chapter 3, Errata, of the Final EIR. Please refer to Response to Comment O2-28 regarding parking. Consistent with the standards in Appendix O for fire access, on-street parking would be permitted on one side of internal street sections that are 32 feet wide and would be prohibited on internal street sections that are less than 32 feet wide. The internal street section widths are shown on Draft EIR Figure 3-3; the northern and southern road segments are proposed to be 32 feet wide. The proposed project would accommodate up to 10 parallel on-street parking spaces within the internal street section, which would be in addition to 2 garage and 2 driveway parking spaces per unit.

02-133 The commenter expresses concern that anticipated fire response times would not meet OFD's target fire response time of 5 minutes for 90% of their Level 1 priority calls. The comment references the sentence on page 21 of Appendix O that states "A final decision regarding the need for mitigation for not strictly complying with OFD's response time goal would be at OFD's discretion," and suggests that such a decision should be made by the City Council, as the lead agency, in a public process. The project is not anticipated to significantly impact evacuation routes or impact emergency response times to the existing community. Further, as discussed in Draft EIR Section 4.13, Public Services, Section 4.18, Wildfire, and Appendix O, the project would have a less than significant impact on fire protection and emergency evacuation. As discussed in Appendix O, the proposed development would be substantially consistent with OFD's 5 minute response time goal and fully compliant with the National Fire Protection Association's national guideline of having a fire response time of 6 minutes and 30 seconds, 90% of the time (Draft EIR Appendix O, p. 19). The sentence referenced in this comment has been removed from both Appendix O and from Draft EIR page 4.18-10 because the anticipated response time is adequate to avoid a significant environmental impact and mitigation is not required. Revisions to Draft EIR Section 4.18 and Appendix O are shown in ~~strikeout~~/underline as shown in Chapter 3, Errata, of the Final EIR. This comment will be included in the Final EIR and provided to decision makers prior to their consideration of project approval.

02-134 The commenter states the Draft EIR fails to support the adequacy of the proposed mitigation for "violation" of FMZ width, noting that use of dual pane windows appears to be the primary mitigation strategy but that dual pane windows are required by code. The comment also notes that project characteristics including widening of Guajome Lake Road, providing additional fire hydrants, and the limited number of new residents and vehicles, are mentioned as justification for the reduced width of FMZ's but the comment asserts that the EIR does not show that these elements are sufficient to reduce the risk to an acceptable level and have not been treated as formal mitigation measures. The comment also asserts that the project fails to meet fire safety standards for FMZs and thus requires mitigation. Finally, the comment states that the Draft EIR does not consider potential impacts to neighboring properties related to the reduced FMZ width.

Provision of additional fire hydrants is required by development standards adopted by the City and fire department and thus does not need to be treated as a mitigation measure. Widening and paving Guajome Lake Road is an element of the proposed project and does not need to be treated as a mitigation measure. The number of new residents and vehicles is directly related to the number of dwelling units proposed and thus inherent in the project description and does not need to be treated as a mitigation measure.

Draft EIR page 4.18-9 explains that "FMZs are typically designed to gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones and irrigated zones adjacent to each other on the perimeter of the structures exposed to the WUI. The project is proposing a site-specific FMZ program with additional measures that are consistent with the intent of the standards." In addition, Appendix O explains that "the adequacy of the provided FMZ widths is based on a variety of analysis criteria including predicted flame length, fire intensity (BTUs) and duration, site topography, extreme weather, position of structures on pads, position of roadways, adjacent fuels, and type of construction" (Draft EIR Appendix O, p. 24). The fire behavior modeling analysis presented in Appendix O found that a wildfire moving through non-maintained chaparral vegetation, such as the vegetation currently present on the project site, would be expected to have flame lengths of 38 feet and that the flame length would be reduced to 14 feet when moving through the treated vegetation within FMZ 2 and to 2.6 feet after moving through FMZ 1. Thus, Appendix O concludes that the proposed FMZs are "approximately 2.5-times the flame length of the worst-case fire scenario under peak weather conditions and would provide adequate defensible space" in the event that a wildfire approaches the Project site (Draft EIR Appendix O, p. 33). Note that this sentence has been revised to correct a text error. To clarify the wildfire protection provisions for the project, revisions have been made to Draft EIR Chapter 3, Project Description, to describe the project design features related to wildfire and to Draft EIR Section 4.18. All revisions to the Draft EIR and technical appendices are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR.

The comment is correct that the EIR identifies that compliance with building code measures regarding fire hardening would help to minimize fire hazards and associated impacts. Specifically, Draft EIR page 4.18-10 states "the project would adhere to City and state fire and building code required measures and code-exceeding measures outlined in Section 4.1 of Appendix O" and is required "to include the latest ignition- and ember-resistant construction materials and methods for roof assemblies, walls, vents, windows, and appendages, as mandated by the California Building Code (Chapter 7A)." Appendix O provides additional details of these requirements on pages 21 and 22. Appendix O also notes that the "Project proposes to provide exterior glazing in windows (and sliding glass doors, garage doors, or decorative or leaded glass doors) facing the open space and naturally vegetated areas to be dual pane with both panes tempered glass to mitigate for the reduced FMZ." These elements do not need to be made formal mitigation measures because they are required by code and/or are proposed as part of the project design, as reflected in the project design features presented in Chapter 3, Errata, of the Final EIR.

Finally, the reduced width of FMZs in portions of the project site would not adversely affect neighboring properties because FMZs are intended to protect the new homes and do not directly offer protection to existing homes in the vicinity. The comment quotes a portion of the text on page 23 of Appendix O, which notes that FMZs are "arguably more important when situated adjacent to

older structures." The quoted statement specifies that the reason for the greater importance of FMZs near older structures is because those older structures "were built prior to the latest ignition resistant codes and interior sprinkler requirements" (Draft EIR Appendix O, p. 23). This illustrates that the intent of the FMZ is to provide protection for the new homes that may be proximate to structures that have a higher potential for fire ignition and spread. In contrast, the homes within the project site will be built to the current building standards and thus will have better fire hardening characteristics than older homes in the vicinity, which would reduce the potential for a fire within the project site to involve multiple structures and lead to increased fire spread.

O2-135 The commenter asserts the EIR incorrectly concludes that it is not feasible to achieve the full 100-foot FMZ width because the full FMZ width could be achieved by reducing the developable area of the site. Draft EIR Chapter 3 and Section 4.18 acknowledge that the FMZs proposed for portions of this project do not meet standard OFD widths within the property boundaries. As discussed in Responses to Comments O2-129 and O2-134, the proposed onsite FMZs combined with the off-site equivalent FMZs are considered adequate to ensure appropriate wildfire protection for the project. Thus, it is not necessary for the project design to be modified to achieve 100 feet of FMZ width onsite.

O2-136 The commenter states that there are two plants that should be included in the Prohibited Plants List provided in Appendix O and that there are native plant species that have potential to be present in the preserved habitat area. The comment suggests that Appendix O should clarify that native plants are permitted in the preserved area. No project activities or vegetation management would occur in the preserved areas outside of the FMZs. It may be necessary to remove native plants within the FMZ if specific native plant species that do not meet the FMZ requirements are present. However, this would occur in a limited area and would not include removal of any riparian vegetation. As discussed in Responses to Comments I7-3 and O2-26 above, Appendix O has been updated to include the San Diego County Fire Protection District's Acceptable and Prohibited Plant list as Attachment D within Appendix O (revisions are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR and in Appenidx O). Further, Section 3.11.2 of Appendix O was updated to state that the San Diego County's Acceptable and Prohibited Plant list (Attachment D) would be used to inform the low-fuel and fire-resistant plant species that would be incorporated into each individual lot and the overall development's landscape plan sets that would be reviewed and approved by the Fire Department and the City prior to planting.

O2-137 The commenter expresses concern that in the event of a wildfire, all of the proposed residences would need to evacuate using Guajome Lake Road, which would also be used for evacuation of existing residences in the vicinity. The commenter asserts that an evacuation time study should be conducted. The comment is correct that the project would provide two access points along the southern boundary of the project site along Guajome Lake Road. As discussed in Response to Comment I4-4, the project site access, including proposed road widths and connectivity and the proposed improvements to Guajome Lake Road, will comply with the City's roadway standards and California Fire Code (CFC) Section 503. Further, because all the proposed residences would include a fire sprinkler system, access from two directions is not required. The project would provide all required emergency access in accordance with OFD requirements, as detailed in Draft EIR Sections 4.13, Public Services, and 4.15, Traffic and Circulation. In the event of an emergency requiring evacuation, the City uses the Genasys evacuation management software to evacuate precise streets and areas to help meter traffic

combined with downstream intersection control to move traffic. This highly detailed and precise evacuation procedure minimizes roadway congestion and evacuation times. Because the project site and surrounding area are not located within a very high fire hazard severity zone, an evacuation time study is not required.

02-138 The commenter states that Draft EIR page 4.13-1 says "residents would have access to the 6.92 acres of common open space," but this amount includes the protected onsite natural habitat where recreational access is not proposed. The quoted text appears on page 4.13-11. The comment is correct that the protected habitat would not be accessible for recreational use. This sentence has been revised to state that residences would have access to approximately 35,151 square feet of private recreational and amenity area within the project site. Revisions to Draft EIR Section 4.13 are shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR.

02-139 The commenter states that Draft EIR page 4.14-1 incorrectly says that the City maintains Lake Calavera Open Space Preserve, Hosp Grove Park, and Guajome Regional Park. The comment is correct that these parks are not maintained by the City of Oceanside. Lake Calavera Open Space Preserve and Hosp Grove Park are both operated and maintained by the City of Carlsbad while Guajome Regional Park is owned, operated, and maintained by the County. Draft EIR Section 4.14, Recreation has been updated to correct this error as shown in ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR. This correction does not impact the analysis or conclusions related to Recreation in the Draft EIR.

02-140 The commenter states that the EIR conclusion that the City will meet its standard of providing 5 acres of parkland for every 1,000 residents is based on completion of El Corazon Park, but there are no assurances as to when El Corazon Park will be built. The El Corazon Specific Plan covers 465 acres and divided the park land at El Corazon into nine park sites. In February 2022, the Oceanside City Council approved an agreement with Schmidt Design Group to plan for El Corazon's Park Site 1. This area will be a 17-acre public park near the northwestern corner of Rancho Del Oro and El Corazon Drive (City of Oceanside 2025). Park Site 1 is currently in final design and construction funding has been assigned through the City's Capital Improvement Program. Additional funding was appropriated in February 2025 by the City Council from the General Fund. Therefore, the Draft EIR analysis is supported by substantial evidence based, in part, on relevant information within available planning documents.

02-141 The commenter states that the Draft EIR does not evaluate impacts to the recreation value of Guajome Regional Park or the trail parallel to Guajome Lake Road particularly related to scenic views, noise, air pollution, and equestrian access due to the widening and improvement of Guajome Lake Road and given that the project will not comply with the Equestrian Overlay District. As discussed in Response to Comment 02-30, Draft EIR Chapter 3, Project Description, states that the project's entry monumentation would use the proposed corner retaining wall in compliance with the Scenic Park Overlay District standards for signs (Draft EIR, p. 3-4) and Section 4.1, Aesthetics, addresses view preservation, building height, building materials and finishes for the proposed project in compliance with the Scenic Park Overlay District development standards. Thus, the project would not cause a significant impact to scenic views visible from Guajome Regional Park. As discussed in Draft EIR Section 4.11, Noise, the project would not result in significant noise impacts and no mitigation measures are required. Once operational, the proposed project would not generate substantial groundborne vibration; noise from use of heating, ventilation, and air conditioning units would be compliant within the City's nighttime threshold of 45 dBA hourly Leq; and the proposed project would not result in readily

perceptible increases in traffic noise. Thus, the project would not generate noise levels that could impair or reduce the recreational value of Guajome Regional Park. As discussed in Draft EIR Section 4.2, Air Quality, with implementation of mitigation, the project would have less than significant impacts to air quality. As shown in Tables 4.2-7 and 4.2-9, emissions of most air pollutants during construction and operation would remain below the SDAPCD thresholds without mitigation, and as shown in Tables 4.2-8 and 4.2-10, emissions of volatile organic compounds would be reduced to less-than-significant levels with the implementation of MM-AQ-1 and MM-AQ-2. Thus, the project would not result in significant air pollution that could impair or reduce the recreational value of Guajome Regional Park. Finally, as stated in Draft EIR Section 4.14, Recreation, the project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses in the surrounding area.

02-142 The commenter states that Table 6-1 fails to identify the numerous projects that are already proposed using density bonus and expresses concern over the City meeting RHNA goal for low-income and very-low-income housing. The commenter also states that the Draft EIR uses the gross RHNA number for the current 8-year housing cycle and does not identify the City's progress towards attaining the needed number of housing units by income level. The commenter also states that above-moderate income homes are larger than more affordable homes and they have more vehicles and emit more GHGs than more affordable homes. The commenter references Attachment C to this comment letter which the commenter described as showing the most recent SANDAG dashboard of housing for the City. The commenter provides their opinion that the City will exceed the needed number of above moderate-income housing units in a few years as it has already achieved 42.5 % in the first two years of the eight-year cycle and predicts that the City will achieve 180% of the total in the eight-year cycle at this pace.

The comment largely pertains to social or economic issues that do not require CEQA review, rather than environmental impacts. Draft EIR Table 6-1 lists the projects identified in the City of Oceanside Planning Projects Map Viewer at the time the Draft EIR was prepared to inform the analysis of the project's potential to contribute to cumulative impacts. It is not necessary to identify approved or proposed projects that rely on the state Density Bonus Law as part of defining the cumulative scenario because the cumulative impacts analysis is based on the number and location of approved and proposed housing units, regardless of whether a project relied upon a density bonus. Please see Response to Comment O2-63 for regarding SANDAG growth projections. The commenter's projection that the City will construct 180% of the required above moderate housing units is speculative because it is based only on the number of permits that have already been processed and reported in the City's Annual Progress Report. The commenter's Attachment C shows that the City still needs to construct 1,480 above-moderate income level units. The City has not received applications to construct all of these units, thus there is no evidence and it is speculative to assume that the City will construct 180% of the required above moderate housing units during the 6th Cycle.

The City is required by the Density Bonus Law to approve waivers requested by eligible projects to allow for an increased density to accommodate affordable units. In general, the state Density Bonus Law is intended to enhance the financial feasibility of building low-income housing units by allowing developers to build more units than normally permitted in a given area, in exchange for including a certain percentage of affordable housing within the project; essentially making it more economically viable to develop low-income housing by providing increased density and potential incentives like reduced development standards. Approval of projects with low-income and very low-income affordable

units would help meet the City's RHNA goals for low-income and very low-income households, per the intention of the state Density Bonus Law. The proposed project would construct four low-income units and pay an in-lieu fee sufficient to support construction of four additional low-income units elsewhere in the City. Thus, the project would contribute to the City's attainment of the RHNA goal for very low-income units.

Draft EIR section 4.7, Greenhouse Gases, found that the project would generate less-than-significant levels of GHG emissions. The GHG analysis was based on modeling that includes consideration of the size of the residences and the associated vehicle traffic. Further, as previously mentioned, there is no distinction between the number of affordable and market rate units for the purposes of the modeling; therefore, no change is required.

02-143 The commenter asserts that the project would induce additional growth in the area because if this non-equestrian project is approved, other similar projects are likely to be proposed. The comment letter includes an attached records search (Attachment D) that the commenter claims demonstrates the project developer is under contract to purchase another nearby property. The attachment provides general property information and contains no information regarding the current owner or a pending sale. There are currently no other active or pending development applications on file with the City in the surrounding area. As described in Section 4.12, Population and Housing, the increase in population growth at the project site is anticipated by and accounted for in the City's General Plan Land Use Element and Housing Element based on the site's existing land use designation of SFD-R (Single-Family Detached Residential), zoning designation of RS-SP-EQ (Single Family Residential – Scenic Park Overlay – Equestrian Overlay), and density bonus. This growth meets the applicable General Plan goals and policies, specifically Policy 3.5, which encourages development of low and moderate housing opportunities, and Policy 3.7, which encourages disbursement of low- and moderate-income housing throughout the City (Draft EIR, p. 4.12-9). The Density Bonus Law is also considered in the City's Housing Element and Zoning Ordinance. The commenter's assertion that approving this project would lead to other similar projects being proposed is speculative and unsupported by substantial evidence. The Draft EIR analysis of population, housing, and potential growth inducement is based on the currently approved and proposed projects in the City. Similar to the proposed project, any development that may be proposed in the future at the site identified in the commenter's Attachment D would also be required to go through the CEQA process and evaluate whether any associated population growth was accounted for in the City's General Plan.

02-144 The commenter suggests that the proposed improvements to a portion of Guajome Lake Road and sewer line extension will facilitate development of additional projects that increase density and alter the character of the project vicinity, which will result in long-term cost implications for the City's taxpayers. As described in Draft EIR Section 4.12, Population and Housing, the project would not lead to indirect growth because the project does not propose substantial infrastructure improvements that would allow for additional unplanned growth in the area but rather would connect the project to existing infrastructure. Further, the surrounding area includes land already developed or designated for residential uses as well as undeveloped land that is designated as Open Space. Thus, the potential for substantial additional development in the vicinity is limited. The project would pave only the segment of Guajome Lake Road along the project site frontage and extending northwest to Albright Street, approximately 1,200 linear feet. This would not increase the capacity of the roadway or reduce the need for developers of other property along Guajome Lake Road to construct their own roadway

improvements. The proposed sewer line extension would construct 2,000 linear feet of sewer line between Old Ranch Road and the project site. All of the properties between the existing terminus of the sewer line and the project site area already developed, thus the sewer line extension would not provide access to the public sewer infrastructure for any potential new development projects. Therefore, the project's infrastructure improvements would not induce additional growth.

02-145 The commenter states appreciation of the identification of a feasible environmentally superior alternative that substantially reduces the project's environmental effects but asserts that further analysis of the alternative's impacts and mitigation is needed because the alternative would rely on similar waivers as the proposed project. As discussed in Response to Comment O2-3, the comment is correct that the Townhome Alternative was identified as environmentally superior to the proposed because it would reduce the level of the significance of project impacts in some environmental analysis areas, including biological resources, cultural resources, and geology and soils (Draft EIR, p. 8-2) and that this alternative anticipates seeking similar or additional waivers of development standards, including reduction of lot sizes, removal of equestrian development standards, reduction or redistribution of setbacks, reduction of open space/landscape minimums, increase of floor area ratio per lot, and retaining wall heights. Chapter 8, Alternatives, of the Draft EIR was prepared in accordance with CEQA Guidelines, Section 15126.6(b) to evaluate feasible alternatives to the project that would avoid or reduce the project's significant impacts while still achieving most of the basic project objectives. CEQA Guidelines Section 15126.6(d) provides that analysis of project alternatives must include "sufficient information … to allow meaningful evaluation, analysis, and comparison with the proposed project." The level of detail provided in the alternative analysis provided in EIR complies with the CEQA Guidelines and provide sufficient detail to compare the potentially significant impacts of each alternative with those of the proposed project. The Draft EIR evaluates the whole of the project, including the requested waivers, and finds that the waivers would not result in any significant impacts, thus the waivers that would be needed to support the Townhome Alternative are also not expected to result in any significant impacts. Please refer to Response to Comment O5-2 regarding alternatives that would require similar waivers as the proposed project.

02-146 The commenter suggests additional analysis that would be needed for the Townhome Alternative. The comment then includes closing statements and a list of Attachments to the comment letter (Attachments A through E). Refer to Response to Comment O2-145 on the scope of the alternatives analysis. The City acknowledges the comment as providing a closing statement and attachments to the letter. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation. . Regarding to the attachments, please refer to Response to Comment O2-92, which references Attachment A, O2-142 which references Attachment C, O2-143 which references Attachment D, and O2-53 which references Attachment E. Regarding Attachment B of this comment letter, the commenter provided a Chatten Brown Carstens Letter on Failure to Implement the CAP. However, the comment letter does not explain the relevance of Attachment B to the analysis of the project in the Draft EIR; therefore, no response can be provided. In any case, the Draft EIR's analysis was prepared for public review by the City and the third party CEQA consultant using the City's adopted guidelines.

02-147 The commenter included supplemental materials for informational purposes that are not specific comments on this project. These materials include standard project conditions for projects located

adjacent to reserve areas or otherwise sensitive habitat areas, an attorney letter to the City on the City's failure to implement its Climate Action Plan, the San Diego County RHNA Dashboard for the City of Oceanside which shows permits for housing developments by affordability, a description of a nearby property under purchase contract, and a letter from the Department of Housing and Community Development to the City of San Diego with justification for the use of waivers. These supplemental materials do not include any specific concerns related to the adequacy or accuracy of the environmental analysis or conclusions in the Draft EIR. To the extent they were discussed in the comment letter, responses have been provided. See Response to Comment O2-146 above. No further response is required.

Comment Letter 03

SIERRA CLUB

COASTERS
NORTH COUNTY COASTAL GROUP

Explore, Enjoy & Protect the Planet

January 10, 2024

Rob Dmohowski, AICP
Principal Planner
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

RE: Guajome Lake Homes DEIR Comments

Dear Mr. Dmohowski:

On behalf of the Sierra Club, I am submitting comments for the proposed Guajome Lake Homes project, and its potential environmental impacts.

We share the concerns and questions raised by Preserve Calavera in its comments on the project DEIR submitted on 1/9/2022. (Attached). Our areas of concern include compatibility with the adjacent neighborhood, regional park, sensitive habitat, GHG, traffic, and housing.

03-1

Preserve Calavera (PC) also documented important zoning issues including whether the project is applying density bonus rules correctly and whether the requirements of a Special Park Overlay Zone (SPOD) and Equestrian Overlay Zone were correctly addressed and/or waived.

03-2

Some additional comments:

Planned Affordable Housing Not Compliant With City Requirement

The project description states that the project will provide 5% affordable/low income units and "pay the remaining 5% of the City's 10% Inclusionary Housing Obligation through the in-lieu fee alternative." However, the DEIR is inconsistent about how many of the dwellings will be affordable, in Appendix O, page 5 the project is described as 84 units with 9 units affordable.

In January 2024 the Oceanside City Council changed the inclusionary requirement for all new developments over nine units to 15%. In both scenarios, it is not meeting the city's minimum 15% requirement. Also if the project opts to pay in-lieu fees it is certainly not maximizing affordable housing in the project plans.

03-3

Continues Pattern of Underserving Low-Income Families
Although the project DEIR stated it was maximizing affordable housing this is another housing project in Oceanside which continues the pattern of underserving low income families and individuals, a pattern that has existed for several years. The attached Table 22 from the May 2023 Draft City of Oceanside Housing Element and the SD County RHNA Dashboard Report demonstrate this significant deficiency in Oceanside of the development of affordable housing.

O3-4

Sustainability Features
The DEIR states that proposed sustainability features include:

1. Photovoltaic solar system installation

The state energy code requirement for new residential construction has required solar installations since 1/1/2020. We urge the project to improve its sustainability by exceeding the minimum energy code requirement for solar.
We also urge the project developers to adopt all-electric plans for the units and eliminate the installation of any gas fueled equipment. The state energy code has moved residential requirements in this direction significantly in its current iteration which will require less changes for projects to go all-electric. Financial incentives for both solar and electric equipment (heat pumps, heat pump water heaters) make this a good investment decision in addition to a more sustainable one.

O3-5

2. Drought-tolerant landscaping and water-efficient irrigation system

This is another minimum state code requirement. The landscaping for new residential construction must comply either with the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO), or a local water efficient landscape ordinance, whichever is stricter, essentially requiring the use of drought-tolerant plants and efficient irrigation systems.
PC provided extensive suggestions for the use of native plants and also flagged an invasive plant that was included on the project landscaping list which should be replaced with a native plant. The Sierra Club urges the project to amend its landscaping plan and incorporate the PC suggestions.

O3-6

Thank you for your consideration of our comments.

Sincerely,

Barbara Collins, Executive Committee Member
Sierra Club North County Coastal Group

Attachments: Preserve Calavera Comments on Guajome Lake Homes DEIR
City of Oceanside Housing Element Table 22
San Diego County RHNA Report on Oceanside

O3-7

Response to Comment Letter O3

Organization
Sierra Club North County Coastal Group
January 10, 2025

O3-1 The commenter states that the Sierra Club North County Coastal Group shares the concerns and questions raised by Preserve Calavera in its comments on the Draft EIR submitted on 1/9/2022. The comment letter attaches a copy of Comment Letter O2 (Preserve Calavera) which is addressed above in Responses to Comments O2-1 through O2-147. The commenter notes that their areas of concern include compatibility with the adjacent neighborhood, regional park, sensitive habitat, GHG, traffic, and housing. Refer to Response to Comment O2-2 above in regard to these areas of concern.

O3-2 The commenter states Preserve Calavera raised concerns regarding density bonus rules and whether the Special Park Overlay Zone and Equestrian Overlay Zone were applied properly. Please refer to Response to Comment O2-33 above, addressing concerns associated with Scenic Park Overlay Zone application. For concerns regarding the proposed project density and if the Equestrian Overlay Zone was applied properly, refer to Responses to Comments I2-8 and I25-3 above and O5-5 below. No further response is required or necessary.

O3-3 The commenter raises a concern that the Draft EIR is internally inconsistent because the number of affordable housing units differs in Draft EIR Chapter 3, Project Description, and the Fire Protection Plan Letter Report (Appendix O). The commenter also states that the project does not meet the City's inclusionary housing requirement.

In regard to the inconsistent project description in Appendix O as it relates to number of affordable housing units, refer to Response to Comment O2-129 above. Revisions to Appendix O that clarify correct number of units are shown in ~~strikeout~~/underline in Chapter 3, Errata, of this Final EIR. Housing unit number sin Draft EIR Chapter 3, Project Description, are correct. The City received the proposed project's Senate Bill (SB) 330 application and fee payment in June 2022, at which time the City's inclusionary housing requirement was 10%. The project preliminary application thus appropriately included an inclusionary housing requirement of 8 dwelling units (10% or 7.4 dwelling units at base density, rounded up to 8 dwelling units) achieved through a combination of the four on-site very low income units and payment of an in-lieu fee ($8.92/sq. foot) for the remaining four units. Per SB 330, approval of an application establishes vested rights of applicable rules in place at the time of submission. Therefore, the City's revised January 2024 inclusionary housing requirements are not applicable to the proposed project. Further, the five percent (four onsite) very low-income units entitle the project to benefits under state Density Bonus Law.

O3-4 The commenter claims that the project is another housing project in the City which continues the pattern of underserving low-income families and individuals. The commenter references Table 22 from the May 2023 Draft City of Oceanside Housing Element and the SD County Regional Housing Needs Allocation (RHNA) Dashboard Report to demonstrate the City's deficiency in developing affordable housing (provided in Attachment E of this Final EIR). Refer to Responses to Comments O2-8, O2-63, O2-67, and O2-124, addressing projected housing growth by income level and the City's RHNA. The project would assist the City in meeting its housing requirements. This is not a comment on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the

Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

03-5 The commenter notes that the project proposes to include photovoltaic solar system installation and urges the project to exceed the minimum energy code requirement for solar. The commenter also requests that the project adopt all electric plans for the units and eliminate installation of gas-fueled equipment to result in a better financial investment and more sustainable project. As noted in Draft EIR Chapter 3, Project Description, each home would be provided with a photovoltaic solar system to meet 50% of forecasted electricity demand. Please refer to Response to Comment O2-62, addressing the commenter's request for all-electric units and eliminating any gas fueled equipment installation. As evaluated in Section 4.7, Greenhouse Gases, of the Draft EIR, impacts related to greenhouse gas emissions were determined to be less than significant, and no mitigation required.

At the time the Draft EIR was prepared, the current Title 24, Part 6 standards, referred to as the 2019 Title 24 Building Energy Efficiency Standards, which became effective on January 1, 2020. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those built under the 2016 standards (Draft EIR, p. 4.5-6) In addition, as evaluated in Section 4.5, Energy, the project would comply with Title 24 energy efficiency standards, use appliances that meet Title 20 requirements, and implement sustainability design features. Implementation of the proposed project would not result in the reduction of substantial amounts of local or regional energy supplies compared to existing conditions (Draft EIR, p. 4.5-14). Therefore, it has been determined that the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant, as evaluated in the Draft EIR starting on p. 4.5-13.

03-6 The commenter requests that the project's required drought-tolerant landscaping and water efficient irrigation comply with either the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO) or the local water efficient landscape ordinance (WELO), whichever is stricter, to ensure use of drought-tolerant plants and efficient irrigation systems. The comment also requests that the project landscaping plan be amended to include Preserve Calaveras's native plant suggestions and flag an invasive plant that was included in the landscape plan.

The project would comply with the City's WELO, as outlined in the City's Code of Ordinances, Chapter 37, Article VII, Water Efficient Landscape Regulations, that is more stringent ordinance than MWELO. Regarding Preserve Calavera's landscaping plan suggestions, please refer to Responses to Comments O2-9 through O2-27 above. Refer also to Section 4.17, Utilities and Service Systems, at pages 4.17-10 through 4.17-11, which explains that sufficient water supplies would be available to serve the project during dry and multiple dry years. The comment does not address the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

03-7 The commenter includes closing statements and supplemental materials for informational purposes. These supplemental materials are included as Attachment E to this Final EIR and include a copy of the Preserve Calavera Comment Letter (refer to Response to Comment Letter O2) which provides specific

comments on the Draft EIR as addressed in Responses to Comments O2-1 through O2-147; a copy of Table 22 on p. III-1 of the May 2023 Draft City of Oceanside Housing Element which outlines the City's progress towards the 2021-2029 RHNA goal for housing developments by income category; and the San Diego County RHNA Dashboard for the City of Oceanside, which shows permits for housing developments by affordability. No further response is required.

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Comment Letter O4

For birds, for people, for the planet.

January 10, 2025

Rob Dmohowski, AICP, Principal Planner
City of Oceanside
Planning Division
300 North Coast Highway
Oceanside, CA 92054
rdmohowski@oceansideca.org

Re: dEIR; SCH No. 2022110028

Dear Rob Dmohowski,

The San Diego Audubon Bird Alliance (SDBA) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. O4-1

SDBA is very concerned about the proposed high-density development adjacent to Guajome Park. Its location, within the North County Multiple Habitat Conservation Program (MHCP) and the potential effect on the nearby Anstine-Audubon Nature Reserve, which is owned and managed by the San Diego Bird Alliance, prompts us to offer these comments and questions regarding this project. O4-2

CEQA Statute Section 21002, states that public agencies should not approve projects that would result in significant effects on the environment if there are feasible mitigation measures or alternatives that can mitigate or avoid these effects. O4-3

The only positive project objective, as proposed, is preserving the riparian habitat. While this habitat will be preserved, the impact from a housing project in such close proximity will have impacts that cannot be mitigated. O4-4 The presence of humans and their companion animals such as dogs and cats will adversely affect the wildlife in this area. O4-5 Cats are not typically well controlled or kept inside and are the #1 cause of mortality of birds in the United States with losses of 2.4 billion birds a year according to the American Bird Conservancy. Additionally, this is an important wildlife corridor that connects the park and the San Luis Rey River and this function was not included in the analysis. Human and wildlife conflicts never go well for wildlife. Will an analysis of this wildlife corridor be performed and added to the dEIR? O4-6

(858) 273-7800 | 4010 Morena Blvd., Suite 100, San Diego, CA 92117 | www.sandiegobirdalliance.org

SAN DIEGO BIRD ALLIANCE

For birds, for people, for the planet.

The proposed project will also destroy the important Federally Threatened California Gnatcatcher (*Polioptila californica)* and State and Federally Endangered Least Bell's Vireo (*Vireo bellii pusillus)* habitat, currently being utilized by a nesting pair of California Gnatcatcher. While mitigation is offered through the Quarry Creek site in Carlsbad, that mitigation will not be helpful to existing species on the property. The geographically restricted California Gnatcatcher has experienced a dramatic reduction in suitable chaparral habitat across Southern California due to development and with the recent Los Angeles fires, this species has suffered immediate loss of chaparral habitat in the 29,000 acres that burned in the last few days. Further, the increased frequency and intensity of fires expected with Climate Change threaten existing habitat as burned habitat depending on fire severity, may require a long recovery time of five years or longer before species recolonization, placing additional pressures on the population. Regarding the Least Bell's Vireo, the San Luis Rey area, located directly south of Marine Corps Base Camp Pendleton supports roughly half of the entire population of the Least Bell's Vireo, with success attributed to the management practices implemented on base. As 2020 estimates of the population are 2,968 breeding pairs in Southern California, any habitat destruction near this core area may further reduce the chances of success for this species. There are many other bird species using this area, as listed in the biological survey. As this project cumulatively contributes to habitat loss and fragmentation for these species, we ask that local population losses and regional population losses be evaluated for impacts as **Section 6.4.3 Biological Resources** does not include this in its analysis. How does this information relate to the finding of cumulative impacts related to biological resources as less than significant?

04-7

04-8

04-9

We support prioritizing the no project alternative because this property is an important habitat core and this alternative would preserve the area with no risk of impact from adjacent housing. As there is no convenient public transportation available in this area we question the wise growth aspect of the proposed project.

04-10

The townhome alternative has some positive aspects in that it preserves the riparian and gnatcatcher/Least Bell's Vireo habitat while increasing the number of affordable housing units. Though less desirable than the no project alternative it would have less habitat destruction than the proposed project.

04-11

The reduced footprint alternative is even less desirable but will at least preserve more of the coastal sage scrub habitat although the value of this is questionable as there will be so much adjacent disturbance.

04-12

We are grateful that CEQA required the analysis of these alternatives and the project, as proposed, is obviously unacceptable with all the impacts described above. We look forward to your response.

04-13

(858) 273-7800 | 4010 Morena Blvd., Suite 100, San Diego, CA 92117 | www.sandiegobirdalliance.org

For birds, for people, for the planet.

Sincerely,

Muriel Spooner
Conservation Committee Co-chair
San Diego Bird Alliance
murielspooner@gmail.com

James Peugh
Conservation Committee Co-chair
San Diego Bird Alliance
peugh@cox.net

Lesley Handa
Lead Ornithologist
San Diego Bird Alliance
LHanda@sandiegobirdalliance.org

O4-13
Cont.

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Response to Comment Letter O4

Organization
San Diego Audubon Bird Alliance
January 10, 2025

O4-1 The comment provides background on the commenter's organization, the San Diego Audubon Bird Alliance. The City acknowledges the comment as an introduction to comments that follow. No further response is required or necessary.

O4-2 The commenter expresses concern in with the development of high-density development adjacent to Guajome Regional Park and the potential effect of the project on the Anstine-Audubon Nature Preserve. Initially, the project is not high-density development but proposed single-family homes. As noted in the Draft EIR, the project is located within the Subarea Plan. While the Subarea Plan was prepared and is used as a guidance document for development projects in the City, it has not yet been adopted by the Oceanside City Council or permitted by the wildlife agencies. The Anstine-Audubon Nature Preserve is located approximately 1.5 miles upstream of the proposed project site, such that the project would not directly or indirectly impact this preserve. And as described throughout the Draft EIR, the project does not propose any temporary or permanent activities within Guajome Regional Park. The Draft EIR adequately addresses the potential for direct and indirect biological resource impacts of the project in Draft EIR Section 4.3, Biological Resources and in the Biological Technical Report (BTR) prepared for the project (Appendix C), which demonstrates that project impacts would be less than significant with mitigation. The responses to comments that follow address specific concerns raised by the commenter.

O4-3 The commenter cites CEQA Statue Section 21002 which requires feasible mitigation or alternatives be provided to mitigate or avoid significant impacts. The City acknowledges the comment as informational only. This comment does not raise a substantive issue on the adequacy of the Draft EIR.

O4-4 This commenter states their opinion that the only positive objective of the project is preserving riparian habitat and expresses concern that the housing project would have impacts to the preserved riparian habitat that cannot be mitigated. Refer to Response to Comment A3-15 as it relates to wildlife corridors, riparian habitat, and associated buffers. The Draft EIR adequately addresses the potential for direct and indirect biological resource impacts of the project in Draft EIR Section 4.3, Biological Resources and in the BTR prepared for the project (Appendix C), which demonstrates that project impacts would be less than significant with mitigation.

O4-5 The commenter expresses concern that the presence of humans and their companion animals will adversely affect area wildlife.

The intrusion of pets such as domestic cats into sensitive habitat adjacent to the on-site and off-site impact areas could negatively affect populations of native wildlife. However, the proposed development is situated in an area already disturbed by non-native species and human activity. Regardless, a project design feature (PDF-BIO-2) has been added to Draft EIR Chapter 3, Project Description, under Section 3.2.5.5 of the EIR that requires the Home Owners Association (HOA) to establish an education program for homeowners regarding responsible pet ownership (i.e., encourages keeping pets indoors, especially at night; having pets neutered or spayed; belling of cats to reduce their effectiveness as predators; and prohibiting release of unwanted pets into the wild). Revisions to Draft EIR Chapter 3, Project

Description; Appendix C; and Section 4.3, Biological Resources are shown as ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR.

04-6 The commenter references a wildlife corridor that connects the Guajome Regional Park and the San Luis Rey River and expresses concern that the project analysis does not analyze impacts to this corridor. In the Draft EIR Section 4.3, Biological Resources, the park connection to San Luis Rey River as well as common species observed in the area are discussed under subsection 4.3.1, Existing Conditions. Refer to Response to Comment A3-15 for a summary and expanded discussion on the wildlife movement impact analysis provided in Section 4.3, Biological Resources, of the Draft EIR. Also refer to Response to Comment I27-13 above.

04-7 The commenter raises concerns that the project would destroy the coastal California gnatcatcher and Least Bell's Vireo habitat, citing that these habitats have already been reduced and continue to be reduced due to development, fires, and climate change.

Refer to Comments A3-12 and A3-14 regarding mitigation for impacts to coastal California gnatcatcher. As analyzed in Draft EIR Section 4.3, Biological Resources, the proposed project will not result in any impacts to riparian habitat which could support least Bell's vireo (refer to Comment A3-15).

04-8 The commenter provides background information on the Least Bell's Vireo population success due to management practices implemented at Marine Corps Base Camp Pendleton and expresses concern that habitat destruction near this area may reduce the species chances of success. The comment regarding management practices at Camp Pendleton is noted for the administrative record; it does not raise any issues concerning this project or the Draft EIR. Regarding potential project impacts to Vireo, please refer to Response to Comment A3-15. The Draft EIR has thoroughly analyzed the project's potential for direct and indirect impacts to special-status species and provided minimization and mitigation measures to reduce potential significant impacts to less than significant.

04-9 The commenter requests that cumulative loss of special-status bird species populations, both on a local and regional level, be included in the Draft EIR, and requests this information be used to determine the cumulative impact is less than significant.

Cumulative biological impacts are discussed in Draft EIR Chapter 6, Cumulative Effects, which provides justification for the impact determination that cumulative impacts, as defined by CEQA, related to biological resources would be less than significant (Draft EIR, p. 6-5). Cumulative projects considered in the analysis are detailed at Table 6-1. As described in the cumulative analysis, direct impacts would be mitigated per the Subarea Plan and the project would comply with the California Fish and Game Code and Migratory Bird Treaty Act to avoid impacts to nesting birds. In addition to Mitigation Measures (MM)-BIO-1 through MM-BIO-11, the project would also implement standard best management practices (BMPs), which would avoid contributions toward cumulative indirect impact to special-status wildlife species and sensitive habitats. Further, other cumulative projects in the area would be required to mitigate impacts to special-status bird species similar to this project, and to comply with federal and state laws, including the California Fish and Game Code and Migratory Bird Treaty Act to avoid impacts to nesting birds. Thus, impacts to special status bird species would not be cumulatively considerable..

04-10 The commenter provides support for the no project alternative because the project site provides important habitat, and the no project alternative would preserve the area and eliminate potential

impacts from adjacent housing. Further, the commenter questions developing the site due to the lack of access to public transportation.

The commenter's support of the no project alternative is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation. The project site is designated for single-family residential in the City's General Plan and zoned for residential development. In regard to public transit concerns, please refer to Response to Comment I4-3 above. Transit was evaluated in Section 4.15, Traffic and Circulation, of the Draft EIR, and impacts were determined to be less than significant. This comment does not otherwise raise a substantive issue on the adequacy of the Draft EIR or that analysis.

04-11 The commenter expresses some support for the townhome alternative (Alternative 3) but also finds it less desirable than the no project alternative due to concerns with habitat destruction. Please refer to Response to Comment O2-3 above. This comment does not raise a substantive issue on the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

04-12 The commenter provides their general opinion that the reduced development footprint alternative (Alternative 2) is even less desirable than the townhome alternative. The commenter also states the alternative would result in more preservation of coastal sage scrub but that the value would be questionable given the level of adjacent disturbance. This comment does not address the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

04-13 The commenter provides closing statements stating general opposition to the proposed project. The City acknowledges the comment as a closing statement to the letter. No further response is required or necessary.

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Comment Letter 05

The McDONALD LAW FIRM, LC

1609 Soledad, La Jolla, CA 92037
Ph: 858.551.1185 | Fax: 858.551.1186
smcdonald@TheMcDonaldLawFirm.com

January 10, 2024

Via Email (rdmohowski@oceansideca.org)
Rob Dmohowski, AICP, Principal Planner
City of Oceanside
Planning Division
300 North Coast Highway
Oceanside, CA 92054

Re: Public Comments on the proposed Guajome Lake Homes Project
TENTATIVE TRACT MAP (T22-00004); DEVELOPMENT PLAN (D22-00009); and
DENSITY BONUS (DB22-00005)[SCH: 2022110028]

Dear Mr. Dmohowski,

This letter is sent on behalf of our clients, Ann Laddon and Adrian Jaffer, who own property and reside at 5435 Albright Street, Oceanside, CA 92057, to provide comments on the Draft Environmental Impact Report ("**DEIR**") for the Guajome Lakes Homes Project (APN 157-412-15-00) located at 2839 Guajome Lake Road in the City of Oceanside ("**Guajome Lakes Homes**" or "**Project**").

The proposed Project includes residential uses within a 16.78-acre project site. The Project also includes supporting amenities, including a recreational area, open space, and landscaping. The property is zoned RS-SP-EQ (Single Family Residential – **Scenic Park Overlay** – **Equestrian Overlay**)(emphasis added), corresponding with the City's General Plan designation of SFD-R (Single-Family Detached Residential). The approvals required for the Project include a tentative map, development plan, and a request for density bonus, with waivers for development standards such as net lot area, lot width, and front, side, and rear yard setbacks.

The Project has several major deficiencies that are not addressed in the DEIR and would preclude approval of a Final Environmental Impact Report that would legally support Project approval. The City must not only address the comments below in a response, but the DEIR itself must be amended and recirculated to comply with statutory and regulatory requirements that would then allow the City to properly exercise its discretion in Project approval or denial.

05-1

Failure to present and discuss any project build-out to Plan.

The most obvious and fundamental failure of the DEIR is not including for consideration a project alternative that is compliant with all zoning and general plan requirements, including without limitation, the Scenic Park Overlay and Equestrian Overlay. Without having a proposed project that is fully compliant with City plans and regulations ("**Plan-compliant project**") to operate as a baseline, the City cannot make a determination as to the impacts of deviations from the City's plans and regulations or decide whether the proposed project is infeasible or whether any proposed alternative might be Environmentally Superior. The current DEIR presents the Applicant's desired project, and then only weighs that Project against other non-compliant alternatives. This does not provide the required analysis to determine the necessity and impacts of deviating from existing requirements.

05-2

Furthermore, and directly relevant to the Applicant's sought-after Density Bonus, there are no facts or discussion regarding the need for waivers of the financial need or benefit, or the impact of granting the waivers on any issue. (See, 12 Cal. Gov. Code § 69515 ("**Density Bonus Law**"))

The Density Bonus Law permits the City to approve a requested incentive and associated waiver or to deny the requested incentive and associated waiver by making a written finding, based on substantial evidence. (Ibid.) The City could conclude that the requested incentive(s) in the Project directly facilitate(s) affordable housing, in which case the Density Bonus Law would compel the city to approve the requested incentive and associated waiver (but not necessarily compel overall approval of the Project). On the other hand, based on that same evidence, the City might conclude that the Project does not need the requested incentive to cover the cost of "provid(ing) for affordable housing costs" (Id., subd. (d)(1)(A); Letter from California Department of Housing and Community Development to City of San Diego, dated December 12, 2024, re: 970 Turquoise Street Project, San Diego – Letter of Technical Assistance ("**DHCD Technical Assistance Letter**")(Attachment A, hereto.)

05-3

It is the clear duty of the City to analyze whether there is substantial evidence as to each requested waiver to support a finding that such incentive whether or not "directly facilitates affordable housing." (12 Cal. Gov. Code, § 65915, subd. (d)(4)). It would be arbitrary and capricious for the City to not take and consider evidence as to not only the potential adverse environmental effects but also not have evidence taken and analyze evidence to determine whether or not to allow granting of each requested waiver and the cumulative impacts of granting such waiver.[1]

[1] The fact that the City would bear the burden of proof to show there is substantial evidence to find that any incentive does not "directly facilitate[] affordable housing" (Id., subd. (d)(4)), in no way reduces the obligation to take and consider all relevant evidence of the need for and effects of each a proposed waiver. A burden of proof only places the burden on the City to support its

Indeed, if the City were to accept the current DEIR as sufficient to support each and every waiver without evidence or analysis would change the Density Bonus Law to read something like, "a lead agency has the discretion whether or not to consider evidence as to whether any benefit exists". Instead, the Density Bonus Law states that an agency has discretion, supported by supported by substantial evidence, to deny a waiver. Only by taking evidence, applying standards, and then making a reasoned (non-arbitrary) determination of a needed financial benefit, individually and cumulatively, to financially achieve the increased density, could the City fulfill the Legislative intent to have waivers only to facilitate a density bonus – in other words, the Density Bonus Law is not a free pass to a waiver regardless of the evidence.[2]

05-3 Cont.

Failure to provide standards and analysis for determining Density Bonus Law waivers.

Throughout the DEIR, the Applicant states that the "Density Bonus Law requires the City to grant an incentive/concession and unlimited waivers." (See. e.g., DEIR E.S. 4 ("state Density Bonus Law requires the City to grant an incentive/concession and unlimited waivers".)(Emphasis added.)) Those statements are legally wrong.

As set forth above, the Density Bonus Law limits waivers to where there is evidence it is needed to facilitate affordable housing. Again, providing some affordable housing is not a free pass to unlimited waivers. The City may not arbitrarily grant a waiver based on the unsupported claim by the Applicant that a waiver is necessary. The City must first take evidence and then evaluate that evidence and apply standards to determine whether granting of the waiver would be necessary to facilitate affordable housing.

The DEIR is not only devoid of evidence: It is devoid of any standard to apply to support any of the requested waivers. Even more egregious, the DEIR fails to provide any evidence of financial infeasibility, as there is no financial analysis for the Project or any of the alternatives provided in the EIR text or appendices. Also, as set forth above, failure to have a Plan-compliant project alternative deprives the City of any evidence as to how waivers are necessary for the proposed Project that is admittedly not Plan-compliant.

05-4

determination and does alter the due process requirements to make decisions that are not arbitrary and capricious or not supported by substantial evidence.

[2] Even if this interpretation were to be considered ambiguous as to the Legislative intent of the need to take and consider evidence, a Court would employ the rules of statutory construction to effectuate that Legislative intent. (See, *City of Huntington Beach v. Bd. of Admin.* (1992) 4 Cal.4th 462, 468).

The DEIR only sets forth a table purporting to show "Project development standards and requested waivers." (DEIR Table 3.3-1) (Exhibit B, hereto). However, no standards are presented. This table simply lists "requirements" and baldly states that the Project will get a "Waiver to accommodate affordable units and development at density proposed." There is no evidence as to the need for any waiver to provide a financial incentive, a comparison to other alternatives, the effects of any waiver, or any standard whatsoever to evaluate any comparison of project alternatives.

The DEIR Project Description (ES.2.2) states:

> Based on the proposed design to accommodate density bonus units, the project anticipates seeking waivers of development standards, including
>
> 1. Reduction of lot size, width and setbacks;
> 2. Density requirements;
> 3. Lot Coverage;
> 4. Lot Depth to Width Ratio;
> 5. Fences and Walls to be exceed height limits and will not be "plantable or irrigated"; and
> 6. Equestrian Overlay regulations will not be met

There is not a single fact cited there or elsewhere as to any of these proposed waivers. Nor is any standard or analysis presented. There is simply no evidence or rationale to support a waiver of any requirement or standard.

Indeed, the only evidence now before the City are the comments of our clients, and others, that a waiver of the adopted Equestrian Overlay would have significant adverse environmental consequences and would also diminish the investment-backed expectations of our clients (see below).

In sum, there are no factors or standards proposed by the Applicant or in the DEIR for approving the requested incentives and waivers. What factors or standards will the City use to evaluate those requests and to evaluate how much additional use should be allowed beyond the proposed affordable units?

O5-4 Cont.

Failure to provide evidence on compliance with Scenic Park and Equestrian Overlays.

The report lacks any facts or details on compliance with the adopted Scenic Park Overlay. The Scenic Park Overlay was established to "conserve and protect valuable natural resources of recreational and scenic areas in and adjacent to the Guajome Regional Park." There is no analysis of the potential impacts of the Project or proposed alternative on this Overlay. Nor is there an analysis of the necessity of waiving compliance with this Overlay.

O5-5

The Project also proposes elimination of the Equestrian Overlay. Elimination would not only alter the fundamental nature of the affected community but is proposed without any facts or analysis of why elimination is necessary to achieve the desired density bonus or otherwise affect the Project or any alternative. There is no analysis of the potential impacts on Park access during and after construction, or the impact on the health and safety of nearby community members and horses, which are pastured adjacent to the proposed project and its access roads. Will there be buffers, fencing, or walls required? What will the overall impact be on equestrian usage that is an important part of this community?

05-5 Cont.

Approval of Proposed Project or an Alternative would impact investment-based expectations.

In addition to the lack of analysis of the need for waivers or impact of complying with the Equestrian Overlay, my clients, and others in the neighborhood bought property in this specific area and made substantial improvements with the investment-based expectation of having an Equestrian Overlay that not just allows – but specifically supports - the raising of horses and riding on equestrian trails adjacent to the Park. (See, Letter of Ann Laddon and Adrian Jaffer, re Public Comments on the proposed Guajome Lake Homes Project, January 10, 2025, incorporated herein by reference.)

05-6

Conclusion.

The DEIR must be amended to address the issues set forth above and recirculated for public comment. Without substantial amendment and subsequent public comment, the EIR would not provide a legal basis for approval of the Project or any alternative.

05-7

Very truly yours,

Steven P. McDonald

Steven P. McDonald
of
The McDonald Law Firm, LC

cc: Ann Laddon
Adrian Jaffer
Courtney Ann Coyle, Esq.

Exhibit A

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
651 Bannon Street, Suite 400, Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

December 12, 2024

Elyse Lowe, Development Services Department Director
City of San Diego
202 C St.
San Diego, CA 92101

Dear Elyse Lowe:

RE: 970 Turquoise Street Project, San Diego – Letter of Technical Assistance

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding the application of the State Density Bonus Law (SDBL)[1] to the development project proposed at 970 Turquoise Street (Project). This letter provides technical assistance for the City of San Diego (City) and the Project applicant regarding the use of incentives and waivers under the SDBL.

05-8

Project Description and Background

HCD understands that the Project would comprise 74 dwelling units, of which five would be deed-restricted affordable to very low-income (VLI) households and another five would be deed-restricted affordable to moderate-income (MI) households, plus 139 visitor accommodation units, which are a commercial use under the City's Municipal Code.[2]

The Project's base density allows for 31 units. The Project is eligible for a 50-percent bonus (16 additional units) for the VLI units[3] and an additional 50-percent bonus (16 additional units) for MI units[4] under the SDBL. The Project is also eligible for an 11-unit bonus under the City's three-bedroom bonus provisions.

In addition, the Project is eligible for three incentives or concessions for providing the VLI units[5] and is also eligible for waivers or reductions of development standards which would have the effect of physically precluding the construction of the Project resulting from the use of those concessions or incentives.[6]

[1] Gov. Code, § 65915.
[2] San Diego Municipal Code, § 131.0112, subd. (a)(6)(K), available at https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division01.pdf.
[3] Gov. Code, § 65915, subd. (f)(2).
[4] Gov. Code, § 65915, subd. (v)(2).
[5] Gov. Code, § 65915, subd. (d)(2)(C).
[6] Gov. Code, § 65915, subd. (e)(1).

The Project applicant proposes to use an incentive to receive an additional 2.31 Floor Area Ratio (FAR) for the commercial component. The applicant further requests a waiver of the zoned 60-foot height limit and the 30-foot height limit under the City's Proposition D, for a proposed height of 240 feet, since those height limits would physically preclude construction of the Project with the additional 2.31 FAR.

The City has requested technical assistance on the following questions:

<u>Question #1</u>: The City understands that incentives and waivers may be provided for non-residential uses. Given that the waivers for height and FAR are predominantly for the non-residential use, does HCD have guidance as to what factors the City may evaluate and to what extent can those waivers and incentives be used to increase the non-residential use component?

The SDBL states that a city shall grant a requested concession or incentive unless the city makes one of three findings, one of which is particularly relevant here.[7] That finding is that the incentive or concession does not "result in identifiable and actual cost reductions… *to provide for affordable housing costs*, as defined in Section 50052.5 of the Health and Safety Code, *or for rents for the targeted units* to be set as specified in subdivision (c)."[8] (Emphasis added.) Section 50052.5 of the Health and Safety Code defines "affordable housing cost" for owner-occupied housing for extremely low-income (ELI), VLI, low-income (LI) and MI households. Moreover, SDBL requires that "rents for the lower-income density bonus units shall be set at an affordable rent, as defined in Section 50053 of the Health and Safety Code."[9]

05-8 Cont.

In other words, the incentive or concession must not just reduce costs (i.e., support the economic feasibility of the Project); that reduction in cost must be for the purposes of *providing affordable housing for lower-income or moderate-income households*.

The statute does not provide precise direction regarding how to determine whether the benefit of a requested incentive or concession has the requisite nexus to the provision of affordable housing. However, the Legislature's intent language provides helpful direction in implementing the SDBL provisions regarding waivers and incentives. The statute reads:

> "In enacting this chapter it is the intent of the Legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter *shall contribute significantly to the economic feasibility of lower income housing* in proposed housing developments."[10] (Emphasis added.)

[7] Gov. Code, § 65915, subd. (d)(1).
[8] Gov. Code, § 65915, subd. (d)(1)(A).
[9] Gov. Code, § 65915, subd. (c)(1)(B)(i).
[10] Gov. Code, § 65917.

Again, the Legislature has made it clear that the purpose of incentives is to support the economic feasibility *of lower-income housing* specifically. The statute further reads:

> "The Legislature finds and declares that the intent behind the Density Bonus Law is to allow public entities to reduce or even eliminate subsidies for a particular project by allowing a developer to include more total units in a project than would otherwise be allowed by the local zoning ordinance *in exchange for* affordable units. It further reaffirms that the intent is to cover at least some of the financing gap *of affordable housing* with regulatory incentives, rather than additional public subsidy."[11] (Emphasis added.)

The City could conclude that the requested incentive in this case directly facilitates the affordable housing, in which case the SDBL compels the City to approve the requested incentive and associated waiver. On the other hand, the City might conclude that the Project does not need the requested incentive to cover the cost of "provid[ing] for affordable housing costs."[12] If the City so concludes, the SDBL places the burden of proof on the City to deny the requested incentive and associated waiver by making a written finding, based on substantial evidence, that the incentive does not result in identifiable and actual cost reductions to provide for affordable housing.[13]

Question #2: What guidance does HCD have for cities to define what is an amenity eligible for density bonus and waivers compared to what is an entirely new project component?

O5-8
Cont.

"Amenity" is not a term used in the SDBL. The concept of an amenity has been discussed in appellate court decisions, most notably in the context of courtyards.[14] A visitor accommodation use is not an amenity but rather a separate land use in a mixed-use project. Mixed-use projects are eligible for SDBL incentives, concessions, and waivers, consistent with the information provided in response to Question #1 above.

Question #3: When evaluating a mixed-use project, is there a minimum amount of residential component to justify that the project is in fact a housing development? Are there any parameters that would prevent the applicant from providing 1 percent of the square footage for housing and 99 percent of the square footage for any non-residential use of its choice?

[11] Gov. Code, § 65915, subd. (u)(1).
[12] Gov. Code, § 65915, subd. (d)(1)(A).
[13] Gov. Code, § 65915, subds. (d)(1)(A), (d)(4).
[14] See, for example, Wollmer v. City of Berkeley, 179 Cal.App.4th 933 (2009) [102 Cal.Rptr.3d 19] and Bankers Hill 150 v. City of San Diego, 74 Cal.App.5th 755 (2022) [289 Cal.Rptr.3d 268].

The SDBL statute does not include a definition of "mixed-use developments" and does not explicitly require a minimum residential component (other than the minimum required five residential units).[15] However, an SDBL project would be subject to a jurisdiction's zoning requirements unless it were eligible for a concession, incentive, or waiver. For this Project, the amount of non-residential use would naturally be limited by the City's zoning requirements (including FAR and height limits) unless the Project uses a concession, incentive, or waiver to increase those limits. As discussed in the response to Question #1 above, the value of the concessions, incentives, or waivers must directly facilitate the proposed quantity and depth of affordability of the affordable units. A project whose floor area is 99 percent commercial and 1 percent residential would likely be outside of these parameters and the concessions, incentives, or waivers needed to achieve that ratio would likely not be required under the SDBL.

Finally, the SDBL statute reads, "This chapter shall be interpreted liberally in favor of producing the maximum number of total housing units."[16] While the SDBL contains no explicit requirement for a minimum percentage of residential floor area in a mixed-use development,[17] an interpretation that a project with the minimum of five residential units is essentially entitled to a theoretically infinite amount of non-residential floor area could result in an absurd outcome that does not further the fundamental purpose of the SDBL.

Question #4: If visitor accommodation uses operate as a residential use with long-term stays, can visitor accommodations and vacation rentals count towards density bonus? If so, should the units be reported as permitted units on a Housing Element Annual Progress Report for purposes of tracking RHNA progress?

O5-8
Cont.

The answer is "no." The visitor accommodation use is deemed a commercial use in the City's municipal code. In addition, the Project has already maximized the number of housing units allowed on the site on top of the 31 units allowed under the base density. There would be no legal way for the visitor accommodation units to be added to the project as housing units. Accordingly, the visitor accommodation units are considered commercial uses, not housing units, and cannot be counted for the purposes of the SDBL, nor can they be reported as housing units on an Annual Progress Report.

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[15] Gov. Code, § 65915, subd. (i).
[16] Gov. Code, § 65915, subd. (r).
[17] In contrast, the Housing Accountability Act provides that, to qualify as a "housing development project," a mixed-use project must have "at least two-thirds of the square footage designated for residential use." (Gov. Code, § 65589.5, subd. (h)(2)(B).) Note that this definition is used in nearly every one of California's housing laws, including but not limited to the Streamlined Ministerial Approval Process (Gov. Code, § 65913.4 (m)(7)), the Housing Crisis Act of 2019 (Gov. Code, § 66300, subd. (a)(6)), the Permit Streamlining Act (Gov. Code, § 65940, subd. (d)), and the Affordable Housing and High Road Jobs Act (Gov. Code, § 65912.101, subd. (e)).

Question #5: If visitor accommodation uses operate as a residential use with long-term stays, are there additional provisions of state law that would allow the City to require a deed-restriction for affordable housing?

As discussed in the response to Question #4 above, the visitor accommodation units are considered commercial uses, not housing units. Therefore, the visitor accommodation units cannot serve as deed-restricted affordable housing units.

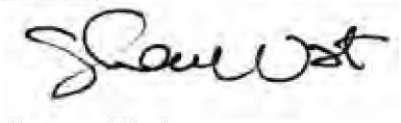
Conclusion

The SDBL permits the City to approve the requested incentive and associated waiver *or* to deny the requested incentive and associated waiver by making a written finding, based on substantial evidence, that the incentive does not result in identifiable and actual cost reductions to provide for affordable housing. In addition, the proposed visitor accommodation units must be considered a commercial use, not a residential use.

O5-1 Cont.

HCD appreciates the opportunity to provide technical assistance on this matter. If you have any questions regarding the content of this letter or would like additional technical assistance, please contact Stephanie Reyes at Stephanie.Reyes@hcd.ca.gov.

Sincerely,



Shannan West
Housing Accountability Unit Chief

Exhibit B

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation Per Single-Family Standards	Proposed Project	Notes
Lot Size (square feet)	6,000 square feet (minimum)	2,464–5,390 square feet	Waiver to accommodate affordable units and development at density proposed
Lot Width	65 feet (minimum)	32–54 feet	Waiver to accommodate affordable units and development at density proposed
Setback – Front	20 feet (minimum)	6–20 feet	Waiver to accommodate affordable units and development at density proposed
Setback – Side	7.5 feet (minimum)	3–7.5 feet	
Setback – Corner Side	10 feet (minimum)	6–10 feet	
Setback – Rear	15 feet (minimum)	5–15 feet	
Density	3.6–5.9 dwelling units/gross acre (44 units max)	83 units with density bonus (6.67 dwelling units/acre)	Waiver to accommodate development at density proposed
Lot Coverage	45% (maximum)	Coverage ranges from 20%–54%	Waiver to accommodate affordable units and development at density proposed
Lot Depth to Width Ratio	2.5:1	Various lots will exceed standard up to a ratio of 3.7:1	Waiver to accommodate affordable units and

05-9

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation Per Single-Family Standards	Proposed Project	Notes
			development at density proposed
Building Height	36 feet (maximum)	Approximately 25 feet	Complies with Code
Parking	One 2-car garage per single-family home	One two-car garage per single-family home; 32-foot-wide street sections allow for guest parking.	Complies with Code
Landscaping	Minimum 50% of yard-adjoining street shall be planting or landscaping (including ornamental gravel). The remainder may be used for driveways or walks.	Landscaped front yard areas would be provided for each lot.	Complies with Code
Useable Open Space	Total useable space shall be at least 300 square feet per dwelling unit.	Over 300 square feet/unit; variable per lot, but every lot proposes more than 300 square feet.	Complies with Code
Fences and Walls	Maximum height of a fence or wall, including retaining walls, shall be 6 feet. Retaining walls over 4 feet in height shall be planted and irrigated.	Proposed retaining walls are not plantable/ irrigated, with wall sections exceeding 6 feet in height: ▪ Exterior Facing – up to 9 feet ▪ Interior Facing – up to 12.1 feet ▪ Interior SW Basin – up to 10 feet	Waivers to accommodate affordable units and development at density proposed
Urban Forestry	Tree canopy minimum on sites 1 acre or more – 12% of site minimum. Permeable surface area minimum on sits 1 acre or more – 22% of site minimum.	Tree canopy would be approximately 15.7%, or approximately 61,238 square feet. Permeable surface area would be approximately 22.5%, or approximately 87,372 square feet.	Complies with Code Complies with Code
Renewable Energy Facilities	Residential projects with 25 or more units shall install and maintain renewable energy facilities that supply at least 50% of forecasted electricity demand.	Each home would be provided with a photovoltaic solar system to meet 50% of forecasted electricity demand.	Complies with Code

05-9 Cont.

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation Per Single-Family Standards	Proposed Project	Notes
Equestrian Overlay District	Article presents specific criteria and development regulations for the Equestrian Overlay District	Project lots are not designed to meet equestrian development regulations, consistent with other residential subdivisions on Guajome Lake Road.	Waiver to accommodate affordable units and development at density proposed

O5-9 Cont.

The City would use this EIR and associated documentation in its decision to approve or deny the required discretionary permits. Other responsible and/or trustee agencies can use this EIR and supporting documentation in their decision-making process to issue additional approvals.

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Response to Comment Letter O5

Organization
McDonald Law Firm
January 10, 2025

O5-1 The comment provides a background on the commenter's organization, the San Diego Audubon Bird Alliance. The comment serves as an introduction to the following responses and reiterates background information about the proposed project as presented in the Draft EIR. The introductory comment is acknowledged and the commenter is directed to the subsequent responses. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

O5-2 The comment contends that the Draft EIR is inadequate because it fails to evaluate a project alternative that fully complies with all zoning and General Plan requirements, including the Scenic Park Overlay and Equestrian Overlay. It asserts that such an alternative is necessary as a "baseline" to determine whether the project is infeasible or if any proposed alternative may be environmentally superior.

In response, CEQA Guidelines Section 15126.6(a) requires an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." However, CEQA does not require an EIR to evaluate every conceivable alternative; rather, it mandates consideration of a reasonable range of potentially feasible alternatives that facilitate informed decision-making and public participation.

Additionally, CEQA Guidelines Section 15126.6(e) requires that an EIR include an analysis of a "no project" alternative. The purpose of this alternative is to enable decision-makers to compare the environmental impacts of approving the project versus not approving it (CEQA Guidelines § 15126.6(e)(1)). For development projects on identifiable property, the "no project" alternative assumes that the project is not approved and that no development occurs, leaving existing site conditions unchanged (CEQA Guidelines § 15126.6(e)(3)(B)). The "no project" alternative does not establish the baseline for environmental impact analysis unless it is identical to the existing environmental setting (CEQA Guidelines § 15126.6(e)(1)).

Here, the Draft EIR evaluates three project alternatives based on identified significant environmental impacts, project objectives, feasibility, and public input (see Chapter 8, Alternatives):

- No Project Alternative (Section 8.4.1);
- Reduced Development Footprint Alternative (Section 8.4.2);
- Townhome (Coastal Sage Scrub Impact Avoidance) Alternative (Section 8.4.3).

Consistent with CEQA, the No Project Alternative assumed a "no development" scenario because the project is development on an identifiable property (CEQA Guidelines § 15126.6(e)(3)(B)). Draft EIR, Chapter 8, Alternatives, compares the impacts and merits of these alternatives and assesses their ability to meet project objectives. Table 8-1 provides a comparative summary, while Section 8.5 identifies the Environmentally Superior Alternative. The analysis concludes that the "no project"

alternative would eliminate the project's significant impacts, but pursuant to CEQA Guidelines Section 15126.6(e)(2), the Townhome Alternative is considered environmentally superior because it reduces impacts on biological and cultural resources, as well as geology and soils. Thus, the EIR evaluates a reasonable range of feasible alternatives, including a "no project" alternative, and identifies the environmentally superior alternative as required by CEQA.

The comment requests analysis of an alternative that is "compliant" with the Scenic Park Overlay and Equestrian Overlay. However, as explained in Section 4.10 of the Draft EIR, the project complies with these requirements through the application of a density bonus, incentives/concessions, and waivers, as permitted under state law. (See Draft EIR, pp. 4.10-9 , 4.10-10, and 4.10-12, and Table 4.10-1, City of Oceanside General Plan Consistency Evaluation.)

The Housing Accountability Act (Gov. Code, §65589.5), and Section 65905.5 of the Government Code (adopted as part of the Housing Crisis Act of 2019, also known as Senate Bill [SB] 330), explicitly state that granting a density bonus, incentive, concession, or waiver "shall not constitute a valid basis on which to find a proposed housing development project is inconsistent, not in compliance, or not in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision" (Gov. Code §§ 65589.5(j)(3), 65905.5(c)(1)). Courts have affirmed this directive applies to CEQA review and analysis. In *Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349, the Court of Appeal held that "waived zoning standards are not 'applicable'" for purposes of determining "consistency with applicable general plan designations and policies and applicable zoning designations and regulations." The project is shown to be consistent and compliant with applicable standards.

To the extent the comment seeks an alternative that denies the requested density bonus, incentives, and waivers, such an alternative is legally infeasible (CEQA Guidelines, § 15364; Gov. Code, § 65915 (b), (d), (e)(1)). Density bonuses and related provisions are mandatory, and agencies must avoid creating the perception of discretionary authority to deny them.[5] (See, e.g., *California Department of Housing and Community Development Guidance to the City of Glendale*, February 5, 2024, available at Discretionary Review of State Density Bonus Law Waiver Requests – Letter of Technical Assistance; *Wollmer, supra,* 193 Cal.App.4th at 1349 [CEQA and Density Bonus Law must be harmonized].)

Finally, regarding the CEQA baseline, the Draft EIR establishes the baseline for environmental review in Chapter 2, Environmental Setting, and Chapter 4, Environmental Analysis. These sections detail the existing physical and regulatory conditions, which serve as the appropriate baseline for environmental analysis—not the alternatives analysis (CEQA Guidelines, § 15126.6(e)(1)).

05-3 The comment asserts that the Draft EIR lacks discussion or factual analysis regarding the need for waivers, including their financial necessity, benefits, and potential impacts. The comment states, "It

[5] See, e.g., HCD Guidance to the City of Glendale. February 5, 2024. Available at Discretionary Review of State Density Bonus Law Waiver Requests – Letter of Technical Assistance This letter explains:
A development project meeting the requirements of the Density Bonus Law is entitled to not only an increase in the number of units allowed on the site (i.e., a "density bonus"), but also to a prescribed number of concessions/incentives and any development standard waivers which are necessary to facilitate the project overall.
Because the granting development standard waivers necessary for the construction of compliant Density Bonus Law projects is mandatory, HCD encourages the City not to hold public hearings on these requests. Public hearings may create the perception of discretionary power where none exists. This, in turn, could place elected officials under pressure to unlawfully deny development standard waiver requests necessary for the completion of projects that meet the Density Bonus Law's requirements. As noted, any such denials which "will have the effect of physically precluding construction of a development" violate the la (Gov. Code, § 65915, subd. (e)(1)).

would be arbitrary and capricious for the City to not take and consider evidence as to not only the potential adverse environmental effects but also not have evidence taken and analyze evidence to determine whether or not to allow granting of each requested waiver and the cumulative impacts of granting such waiver."

In response, the Draft EIR evaluates the environmental impacts of the proposed project, including the requested density bonus, incentives, and waivers. The analysis covers the construction of 83 single-family homes (including four affordable units) on approximately 9.86 acres of the 16.78-acre project site. It also considers the waivers of various development standards, including reduced lot sizes, removal of equestrian development requirements, modified setbacks, reduced open space and landscaping minimums, increased floor area ratios, and increased retaining wall heights. Under *Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349, waived development standards are not considered "applicable" for determining consistency with General Plan policies or zoning regulations and were assessed accordingly in the EIR.

The comment generally raises legal, economic, social, or political concerns that do not pertain to physical environmental effects. As such, no further response is required under CEQA.

Although not a CEQA issue, the following response is provided to clarify the requirements of the state Density Bonus Law. Contrary to the comment's assertion, a project that meets Density Bonus Law eligibility criteria is entitled to a density bonus, concessions/incentives, development standard waivers, and reduced parking ratios (Gov. Code, § 65915(b), (d), (f), (p)). The law explicitly states that the City must grant these benefits unless limited exceptions apply (Gov. Code, § 65915(d)(1)(A)-(C)). The purpose of these provisions is to help close the financing gap for affordable housing and promote residential development statewide (Gov. Code, § 65915(u)(1), (2)).

It is important to distinguish between concessions/incentives and waivers, as they are subject to different standards. Concessions/incentives allow an applicant to seek:

- A reduction in site development standards or a modification of zoning code or architectural design requirements, such as a reduction in setback or minimum square footage requirements;
- Approval of mixed-use zoning; or
- Other regulatory incentives or concessions that result in identifiable and actual cost reductions to provide for affordable housing costs (Gov. Code, § 65915 (d), (k)(1), (k)(3)).

Under the Density Bonus Law, the City "shall grant" the specific concessions requested, which are *presumed* to provide cost reductions (Gov. Code, § 65915 (d)). While early versions of the Density Bonus Law allowed an agency to require financial documentation such as a pro forma or study to support the need for concessions[6], *Schreiber v. City of Los Angeles* (2021) 69 Cal.App.5th 549, held that such documentation cannot be mandated. The Legislature subsequently adopted Assembly Bill (AB) 1287 (Alvarez, 2023), which prohibits cities from requiring additional reports, studies, or

[6] HDC technical assistance letter to the City of Larkspur, "RE: Magnolia Avenue Project (1169-1133 Magnolia Ave.) – Letter of Technical Assistance." May 12, 2022. http://www.hcd.ca.gov/community-development/housing-element/docs/marLarkspur-TA-051222.pdf.
Gov. Code, § 65915 (d)(1)(A)-(C).
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB2501

reasonable documentation to justify eligibility for incentives/concessions and waivers.[7] (Gov. Code, § 65915, subd. (a)(2)).

Waivers, unlike incentives, are not tied to any "financial need or benefit." Instead, Government Code section 65915 (e)(1) mandates waivers for any development standard that will have the effect of physically precluding the construction of a development meeting Density Bonus Law criteria at the allowed density and with the requested concessions/incentives. (See also, Bankers Hill 150 v. City of San Diego (2022) 74 Cal.App.5th 755, 775.)

Accordingly, the comment's request for evidence of financial necessity or benefit for incentives and waivers is inconsistent with the Density Bonus Law, and in the case of waivers, entirely irrelevant. Nonetheless, all public comments, including this one, will be provided to decision-makers for review and consideration before a final determination on the project.

05-4 The comment asserts that it is "legally wrong" to claim that the Density Bonus Law requires the City to "grant an incentive/concession and unlimited waivers"; it asserts the City must take evidence. It further argues that the EIR must include a project alternative that complies with existing plans, that there is no evidence supporting the waivers, and that eliminating the adopted Equestrian Overlay would result in significant adverse environmental impacts while diminishing the investment-backed expectations of the commenter's clients.

In response, the comment primarily raises legal, economic, social, or political issues that do not relate to any physical effect on the environment. As such, no further response is required under CEQA. The comment will be included in the Final EIR for consideration by decision-makers before a final decision on the project. The commenter is also referred to Responses to Comments O5-2, O5-3, O5-5, and O5-6.

Regarding waived development standards, as discussed above, such standards are not considered "applicable" when evaluating consistency with a plan, zoning ordinance, or other regulations (*Wollmer, supra,* 193 Cal.App.4th at p. 1349; Gov. Code, § 65589.5 (j)(3)). Further, under the Density Bonus Law, "so long as a proposed housing development project meets the criteria of the Density Bonus Law by including the necessary affordable units, a city may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes 'amenities' beyond the bare minimum of building components" (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775; *Wollmer, supra,* 193 Cal.App.4th at p. 1347).

Table 3.3-1, Project Development Standards and Required Waivers (provided in Draft EIR Chapter 3 and updated in Chapter 3, Errata, of this Final EIR), details the requested waivers, which are necessary to accommodate the project's design and proposed density. These waivers primarily address siting and sizing requirements, including modifications to lot size, width, setback, density, lot coverage, depth-to-width ratio, retaining walls, and equestrian development regulations (Gov. Code, § 65915 (e), (o)(2)).

[7] See, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1287

In response to the claim that waiving the adopted Equestrian Overlay would result in significant adverse environmental consequences, refer also to Response to Comment O5-5.

Finally, regarding the standards used to evaluate requested incentives and waivers, refer to Government Code Section 65915 and Response to Comment O5-3.

O5-5 The comment states the EIR lacks facts or details on compliance with the Scenic Park Overlay and the necessity of waiving the requirement to comply with that overlay. The comment states the project proposes elimination of the Equestrian Overlay and that there is no analysis as to why elimination is necessary. Additionally, the comment states there is no analysis of impacts on access to Guajome Regional Park, or on health and safety of community members and horses. The comment asks whether there will be buffering, fencing, or walls required, and inquiries about the overall impact on equestrian usage. In response, the EIR addresses compliance with the Scenic Park Overlay Zoning District and evaluates related environmental impacts in multiple sections of the document. For example, Section 4.1, Aesthetics, explains at page 4.1-5 that:

Article 22 of the City's Zoning Ordinance covers the Scenic Park Overlay District. The purpose of the Scenic Park Overlay District is to:

- Conserve and protect valuable natural resources of recreational and scenic areas in and adjacent to Guajome regional Park and other public parks.
- Encourage the retention of natural slopes and waterways and minimize grading and alteration of drainage patterns.
- Achieve a visually pleasing and compatible relationship between buildings and structures, park areas, walkways and planting areas, and the natural environment.
- Provide appropriate standards and criteria for reviewing proposals for new construction, exterior additions and alterations, relocation of buildings, and other development subject to the provisions of this Article.

Article 22 also establishes development regulations, including general regulations, grading limitations, view preservation, building height, building materials/finishes, parking/loading, utilities, and signs. Development plans for projects within the Scenic Park Overlay District shall be reviewed for compliance with the review criteria and requirements of Article 22 and with all other applicable requirements of the City Municipal Code. The project site is within the Scenic Park Overlay District[8].

Additionally, as stated on page 4.1-6 of the Draft EIR:

Development plans for projects within the Scenic Park Overlay District shall be reviewed for compliance with the review criteria and requirements of Article 22 and with all other applicable requirements of the City Municipal Code. The project site is within the Scenic Park District Overlay District and the Guajome Regional Park Sphere of Influence (SOI) and would be subject to objectives and policies under the Guajome Regional Park SOI as outlined under Section 4.1.2.

[8] Article 22 is available at: https://www.ci.oceanside.ca.us/home/showpublisheddocument/4044/637953037791900000

The following table demonstrates how project consistency with the Development Regulations set forth in Section 2204 of the Zoning Ordinance for the Scenic Park Overlay District is addressed in the Draft EIR:

Development Regulation	Project Consistency
A. General: All development shall be compatible with the topography, vegetation, and colors of the natural environment and the established physical scale and character or the area and not materially degrade the visual resources of the site or adjacent public parks.	Consistent. As described in Chapter 3, Project Description, and Section 4.1, Aesthetics, of the Draft EIR at pages 4.1-7 to 4.1-8, the project would be built in a variety of contemporary architectural designs in one of three styles, referred to as "ranch," "farmhouse," and "progressive prairie." The architectural styles would be reinforced through massing and materials. A variety of roof forms would be included to shape the massing, ranging from all gable, a combination of hip and gable, and all hip. Style-specific window grids and window and door trim, along with front door and garage door styles, would help reinforce the architectural character. The homes would be predominantly stucco, with either shingle, board and batten, or lap siding accents. Primary proposed building material finishes would include white, grey, or beige stucco exterior walls. Enhanced elevations would be included based on the elevation exposure to public edges. The proposed home plans each have 3 elevation styles, with each style having 3 distinct color schemes, resulting in 27 possible combinations. All outdoor lighting would meet Chapter 39 of the City Municipal Code (light pollution regulations) and would be shielded appropriately. Street lighting featured throughout the site would be appropriately shielded to reduce lighting impacts to the surrounding open space areas and improve dark-sky regulation compliance. Additionally, the proposed development would be set back from Guajome Lake Road and adjacent residences to provide privacy and visual relief. Furthermore, proposed landscaping is designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. Retaining walls would be located along the project frontage, entries, and best management practice areas to support the required grading and storm drainage for the project site. A variety of vegetation would be featured along the boundaries of the project site. Drought-tolerant plants would be utilized as aesthetic and functional requirements for the site. Landscaping would also be featured adjacent to public rights-of-way. Building heights would be limited to 25 feet. Further, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses. Final

Development Regulation	Project Consistency
	site plans and landscape plans would be subject to review and approval by the City, further ensuring compatibility. Thus, the project would be consistent with this regulation.
B. Grading Limitations: Alterations of existing natural or artificial contours of land shall be minimized; no major ridge line shall be altered; and any contour altered by grading shall be covered by topsoil and planted with native or drought resistant plant materials compatible with the adjacent landscape.	Consistent. All homes would be developed on the southern portion of the project site, which has been previously disturbed and graded. The project would avoid the northernmost portion of the project site along the riparian corridor, preserving approximately 6.92 acres of the 16.78-acre project site as open space (Draft EIR, p. 3-2). Landscaping is designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. Retaining walls would be located along the project frontage, entries, and best management practice areas to support the required grading and storm drainage for the project site. A variety of vegetation would be featured along the boundaries of the project site. Drought-tolerant plants would be utilized as aesthetic and functional requirements for the site. Landscaping would also be featured adjacent to public rights-of-way. (Draft EIR, p. 4.1-7)
C. View Preservation: Structures shall be oriented to preserve views of the Guajome Regional Park and other public parks. The City Planner may modify this standard to protect sensitive biological resources, critical habitat, or wildlife corridors	Consistent. Building heights would be limited to 25 feet. Further, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses.
D. Building Height: Maximum building height shall not exceed 25 feet within 100 feet of the boundaries of Guajome Regional Park and other public parks provided that the City Planner may permit additional height, up to the limit set for the base district, if he finds that the proposed structures are in reasonable architectural harmony with the character of the area.	Consistent. Project building heights would not exceed 25 feet in height within 100 feet of Guajome Regional Park boundaries (Draft EIR, p. 3-9).
E. Building Materials and Finishes: Primary exterior materials shall be brick, stone, exterior cement plaster (stucco), concrete or wood, and all exterior building finishes shall be painted in earth tones or other colors that are compatible with the surrounding landscape, unless the walls are textured, in which case no paint shall be required, or the City Planner finds that the type of finish is in reasonable architectural harmony with the area. All roofing materials shall be compatible in color and texture with the surrounding environment. Fencing along the boundary of the Guajome Regional Park and other public parks, shall be of uniform texture, color, style, and materials to protect and enhance the viewshed of the park	Consistent. Refer to explanation for Development Regulation A, General, above and Draft EIR pages 3-5 and 4.1-8.

Development Regulation	Project Consistency
F. Parking and Loading: On lots abutting a public park, no on-site (off-street) parking or loading spaces shall be exposed to view from the park	Consistent. The project would provide two-car garages for each single-family home, which would include a full driveway for additional parking. (Draft EIR, Section 3.2.3.4, Parking). None of the proposed homes would face the park, thus the garages and driveways would not be visible from the park. Parking would be internal to the development. Parking lots are not proposed. Refer to Draft EIR Chapter 3, Project Description, and Figure 3-3, Conceptual Site Plan.
G. Utilities: Underground utilities shall be provided unless the City Planner finds that underground installation would have a substantial adverse impact on the environment. Amateur and professional radio antennas, satellite antennas, and microwave transmitting and relay equipment shall be allowed in the Scenic Park Overlay District in accordance with Article 39 of this Zoning Ordinance	Consistent. Project utilities would be installed underground (Draft EIR, p. 4.18-9).
H. Signs: All signs shall be subject to the applicable provisions of Article 33 and the following provisions: 1. No roof signs or painted wall signs shall be permitted. 2. The maximum height of pole signs shall not exceed 25 feet, measured from existing grade. 3. No off-site signs, including outdoor advertising signs, temporary leasing or for sale signs, or subdivision signs, shall be permitted except for multi-use directional signs on a free-standing pole or structure no more than 8 feet high with a maximum width of 4 feet for each panel. No pole or sign structure may have more than four sign panels. 4. No temporary promotional signs or political signs shall be permitted	Consistent. Signage would comply with this regulation. As described in Section 3.2.1.2, entry monumentation would utilize the proposed corner retaining wall. The proposed signage would create a gateway into the community. Additional signage is not currently proposed.

In sum, the project has been designed consistent with the Scenic Park Overlay District development regulations. The City will review the project's development plans for compliance with the review criteria and requirements of Article 22, as well as other applicable requirements of the City Municipal Code.

Regarding the comment on the "elimination of the Equestrian Overlay," the Draft EIR explains that the project is seeking to obtain waivers of specific equestrian development standards to accommodate the density bonus units—it is not seeking to eliminate the overlay. These standards include requirements for minimum horse yard area (7,200 square feet), common space for equestrian facilities (2,500 square feet per unit), equestrian trails (10 ft wide), a specific lot depth to lot width ratio to allow depth for corrals, locational requirements of horse stabling, siting of structures adjacent to horses on adjacent lots, and buffering/setbacks from non-equestrian residential properties. (Section 2806 of Oceanside Zoning Ordinance). The project proposes single-family homes with average lot sizes of approximately 3,200 square feet, with homes ranging in size from 1,869 to 2,220 square feet. Accordingly, waiving these Equestrian Overlay standards is necessary to accommodate the project's proposed design and

density. With respect to potential impacts on park access, please refer to Responses to Comments A2-12 and A2-13. The Draft EIR explains that the project would improve Guajome Lake Road, including parkway and sidewalk improvements. These would provide for improved vehicular and pedestrian access to Guajome Regional Park. During construction, as a standard condition, the project would be conditioned to implement a traffic control plan per the City traffic control guidelines, which would ensure continued Park access.

In response to concerns about the health and safety of community members and horses, these are generally social issues that are not subject to CEQA review (*Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 585; *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357). To the extent health and safety concerns pertain to physical environmental impacts, the Draft EIR has evaluated such effects, including regarding air quality (including specifically health impacts at pp. 4.2-23 and 4.2-24), noise, water quality, hazards and hazardous materials, wildfire risks, etc. The analysis concludes that no project impacts would be significant and unavoidable. (See Draft EIR Section 4, Environmental Analysis, Section 5, Effects Found Not to Be Significant, and Section 7.3, Significant and Unavoidable Impacts.)

The Draft EIR also evaluated project impacts to recreation. Section 4.14.4 of the Draft EIR explains: "The project requests waivers from the Equestrian Overlay District development standards. The project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses in the surrounding area." Impacts to recreation were determined to be less than significant.

The proposed residential development is not generally considered a land use that would create significant adverse health or safety impacts or conflicts with equestrian uses. Further, the project design would preserve 6.92 acres of open space between the project's residential uses and existing homes to the north, creating a substantial buffer that mitigates potential land use conflicts. Additionally, the Draft EIR, Section 3.2.1.3, Landscaping and Walls, and Section 3.2.2, Architectural Design, describes how fencing will be installed around the development's perimeter and details the project's significant landscaping features. Retaining walls will also be placed along the project frontage, entry points, and best management practice areas. Through these design elements, the project has been planned to minimize any potential impacts on the surrounding community and equestrian uses.

O5-6 The comment states the project would impact "investment-based expectations" as the commenter's clients and others in the neighborhood bought property based on expectations of the Equestrian Overlay and related uses. In response, the comment raises legal, economic, social, or political issues that do not relate to a physical effect on the environment. The Density Bonus Law is a state mandated program that requires local agencies to grant certain development densities and other benefits to facilitate housing development, recognizing it as a matter of statewide importance. The comment is opposition to the project is acknowledged and will be included as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. However, no further response is required under CEQA because the comment does not raise an environmental issue. For additional discussion on how the project design promotes compatibility with the surrounding area and equestrian uses, please refer to Response to Comment O5-5.

O5-7 The comment asserts the Draft EIR must be recirculated before certification. As discussed above, the commenter's input has been considered and it has been determined that the EIR does not require the addition of significant new information that would trigger recirculation. Under CEQA Guidelines Section

15088.5, recirculation is only required when "significant new information" is added to the EIR after public notice of the availability of the Draft EIR is given, but before certification (CEQA Guidelines, §15088.5(a)). "Significant new information," as defined in CEQA Guidelines Section 15088.5(a), means information added to an EIR that changes the EIR so as to deprive the public of a meaningful opportunity to comment on a "substantial adverse environmental effect" or a "feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

An example of significant new information provided by the CEQA Guidelines is a disclosure showing that a "new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;" that a "substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance;" or that a "feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it" (CEQA Guidelines, §15088.5(a)(1)-(3)). However, recirculation is not required where "new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR" (CEQA Guidelines, §15088.5(b)). The addition of new information does not automatically trigger recirculation, as CEQA's public and agency comment process inherently involves updates, clarifications, and refinements. Recirculation is intended as an exception rather than the general rule *(Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1132).

While this Final EIR includes insignificant revisions that expand upon, clarify, or enhance the Draft EIR's findings, these refinements do not identify new significant impacts or identify feasible alternatives or mitigation considerably different from those considered that the project proponent declines to adopt, or otherwise require recirculation.

The comment is acknowledged as providing concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Accordingly, no further response is required.

05-8 The comment attaches a letter of technical assistance from the Department of Housing and Community Development to the City of San Diego regarding the 970 Turquoise Street project.

The referenced document has been reviewed and considered. The comment primarily raises legal, economic, social, or political issues that do not pertain to a physical effect on the environment. As such, no response is required under CEQA, as the comment does not present an environmental issue.

Moreover, the cited document reaffirms state housing law within a distinguishable factual context. Specifically, the technical assistance letter addresses a mixed-use development and examines the use of incentives and waivers to *increase non-residential, commercial uses.* In that case*,* the nexus between the incentives and affordable housing was unclear. However, HCD nevertheless affirmed that the incentives were subject to a rebuttable presumption of facilitating affordable housing. As for waivers, the letter confirmed the mixed-use project would be eligible for them.

In contrast, the proposed project is exclusively residential uses, with amenities and open space. Under Density Bonus Law, the project is entitled to the requested waivers to accommodate the on-site

residential uses at the density allowed. Nothing in HCD's guidance letter suggests otherwise. Please refer also to Response to Comment 05-3.

05-9 The comment attaches Table 3.3-1, Project Development Standards and Required Waivers, from the Draft EIR. The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project; however, no further response is required.

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Comment Letter 06



Buena Vista Audubon Society
PO Box 480
Oceanside, CA 92049-0480

January 10, 2025

Sent by email: rdmohowski@oceansideca.org

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

SUBJECT: Comments on Guajome Lake Homes DEIR

Dear Mr. Dmohowski,

We have reviewed the DEIR for the above project and have the following comments on behalf of the Buena Vista Audubon Society. The proposed project is a housing development of 83 single-family homes located off Guajome Lake Road, across from the Guajome Regional Park in Oceanside. The 394-acre multi-use park contains diverse Southern California habitats, including wetlands, woodlands, chaparral, coastal sage scrub, and mixed grasslands. These habitats and two ponds attract a variety of resident and migratory birds, including endangered and threatened species, with habitat linkages throughout the surrounding community, including the subject property. Guajome Regional Park is a birding hotspot, and linkages with surrounding properties are essential for longterm sustainability of endangered species and other local birds and wildlife. We have many concerns that the proposed housing project would have significant environmental and other community impacts which are described below. 06-1

BIOLOGICAL RESOURCES

The northern part of the 16-acre project site contains a creek and riparian habitat that continues through the neighborhood and ultimately drains to the wetlands in the Regional Park. In addition, bordering the riparian habitat the property contains coastal sage scrub habitat that, during the biological surveys, was observed supporting a nesting pair of coastal California gnatcatchers, a threatened species under the US Endangered Species Act. The endangered least Bell's vireo is known from the vicinity and could have been nesting onsite or could use the site in the future. Due to the presence of this significant wildlife corridor, the northern part of the property was identified in the multi-jurisdiction 2003 MHCP Plan as a Focused Planning Area (FPA), an area within which land would ultimately be dedicated for open space and habitat conservation. These FPAs were designed to conserve as much of the Biological Core and Linkage Area as possible and minimize preserve fragmentation within the seven jurisdictions. 06-2

Subsequently, Oceanside developed a Draft Subarea Plan (DSAP) in which this significant riparian corridor and upland coastal sage scrub, as it runs through the subject property, was placed in a Hardline Preserve (See Oceanside Draft SAP Figure 4.1). The DSAP indicates that Hardline Preserve areas are to be designated as biological open space and preserved in 06-3

perpetuity. Development is largely prohibited in these preserve areas. Hardline Preserves and conservation banks are areas that are already preserved to DSAP standards, as opposed to Soft-line Preserves that identify area targeted for future preservation, but which are dependent on future development of those parcels. As applications for development are processed and development design plans are formulated, preservation would occur through the application of DSAP standards and policies. Currently, the City uses the Draft SAP as guidance for the protection of natural resources in the City, and these resource protections are important enough that they are currently being incorporated into the update to the City's General Plan.

06-3 Cont.

PROJECT IMPACTS

The southern part of the property where most of the development is proposed supports non-native grassland and a previously degraded area. However, the proposed housing footprint overlaps with on-site sensitive habitat and therefore would result in significant impacts, including a loss of 1.25 acres of "occupied" coastal sage scrub habitat and 8.29 acres of grassland. In addition, the project would not provide the necessary 100-foot riparian buffer and the proposed 30-foot fuel modification zone would further impinge upon the reduced buffer. As indicated in the DSAP, the 100-foot riparian buffer is essential to preserve the integrity of that ecosystem. In addition, there is no provision for permanent protective fencing of the sensitive habitat nor are there provisions for the ongoing monitoring and maintenance of the habitat by a responsible third party to protect the onsite habitat in perpetuity. The proposed HOA arrangement is not adequate. In addition, the project needs to address indirect impacts from the development for habitat protection including deflected lighting away from the habitat, prohibition of invasive landscaping, protection from domestic cats, and bird-proof windows.

06-4

06-5

06-6

06-7

Although the project proposes mitigation for biological impacts by offsite creation of coastal sage scrub, the DSAP requires that avoidance of onsite habitat loss and preservation is the preferred option to protect habitat when feasible, and this project could have been designed to do just that. In addition, the proposed mitigation is the creation of habitat at what is described as a "Quarry Creek mitigation site" which we are unable to find documented anywhere, and in any case this would be outside the Wildlife Corridor Planning Zone which is the designated area in the DSAP for coastal sage scrub mitigation. In addition, the proposed 2:1 mitigation for the loss of coastal sage scrub does not meet the required 3:1 as stipulated in the DSAP. No provision is made for a wildlife corridor from the property to open space in the Regional Park.

06-8

06-9

06-10

Other notable significant project impacts would occur due to the following:

Impacts resulting from non-compliance with standards in the Equestrian Overlay Zone that would not accommodate horses or provide equestrian access to Guajome Lake and its series of horse trails;

06-11

Impacts resulting from non-compliance with standards in the Special Park Overlay Zone that protects the Guajome Lake Regional Park with regard to grading limitations, view preservation, building height, air quality, access limitations, etc;

06-12

Growth inducement and cumulative impacts due to the need to extend utilities and sewer, and road improvements;

06-13

Poor traffic circulation and access due to road improvements limited to the property boundary but that remains a dirt road beyond that point, and lack of a comprehensive analysis of traffic circulation in the area; 06-14

Inadequate GHG analysis and non-compliance with CAP provisions. Significant impacts based on non-compliance with the VMT/capita threshold which upon project completion in 2027, would be required to decrease from the threshold in 2024; and 06-15

Post-project drainage as described is not consistent with the hydrology report. 06-16

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Townhouse Alternative is the environmentally superior alternative, as it would reduce project impacts on biological resources, cultural resources, geology and soils, as stated in the DEIR. The townhouse design would provide 90 townhouse units and 14 affordable units, more than provided by the proposed project. The development footprint would increase open space and avoid direct impacts to the most sensitive habitats on the property, thereby avoiding the need for a take permit for the federally listed coastal California gnatcatcher. However, the design of the townhouse development is not described in the DEIR and has some of the same potential impacts of the proposed project. Therefore, a thorough DEIR-level analysis of impacts is still required before approval of the townhouse project by the City. 06-17

CONCLUSION

In conclusion, the proposed development is inappropriate for a property with significant biological resources and wildlife linkages to a large regional park that must be protected for future generations. The DEIR shows that the proposed project would also have significant land use and other environmental impacts. An environmentally superior alternative would better protect sensitive habitat, and community standards and needs. However, further analysis of environmental impacts is required before any project should be approved for this property.

Thank you for considering our views on this matter. 06-18

Sincerely,

Joan Herskowitz, Member
Conservation Committee
Buena Vista Audubon Society

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Response to Comment Letter O6

Organization
Buena Vista Audubon Society
January 10, 2025

O6-1 The comment provides a brief introduction, provides a summary of the project, and notes the project site's proximity to Guajome Regional Park and the diverse Southern California habitats which attracts wildlife, including endangered and threatened species, with habitat linkages throughout the surrounding community, including the subject property. The commenter expresses concern that the project would have significant environmental and other community impacts described in the following comments. In regard to project's effects on wildlife movement, please refer to Response to Comment A3-15 above. As described in the Draft EIR, the project site is located outside of the Wildlife Corridor Planning Zone designated by the Subarea Plan and finds that the project would not result in the loss of wildlife corridors or habitat linkages (Draft EIR, p. 4.3-21).

O6-2 The comment provides a summary of the biological resources on the project site, including riparian habitat and coastal sage scrub habitat supporting an observed nesting pair of coastal California gnatcatchers and potentially Least Bell's vireo, as described in the Biological Technical Report (Appendix C). The commenter also states the northern part of the property includes a creek and riparian habitat identified in the multi-jurisdictional 2003 North County Subregional Multiple Habitat Conservation Program (MHCP) Plan as a Focused Planning Area, an area within which land would ultimately be dedicated for open space and habitat conservation designed to conserve as much of the "Biological Core" and "Linkage Area" as possible and minimize preserve fragmentation within the seven jurisdictions. The comment provides background information, recites information included in the Draft EIR, and does not raise a comment related to the adequacy of the Draft EIR. Nevertheless, please refer to Comments A3-12 and A3-14 regarding mitigation for impacts to coastal California gnatcatcher. Refer to Response to Comment A3-15, addressing potential impacts to riparian habitat, which the Draft EIR acknowledges has potential to support nesting and foraging habitat for Least Bell's Vireo (Draft EIR, p. 4.3-9). Additionally, as provided in Response to Comment A3-15 and discussed in the Draft EIR Section 4.3, Biological Resources, the project would not result in the direct loss of any riparian habitat (Draft EIR, p. 4.3-21). This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

O6-3 The commenter states the riparian corridor and upland coastal sage scrub present in the project site is within a Hardline Preserve per the City's Subarea Plan which, as indicated by the Subarea Plan, are to be designated as biological open space and preserved in perpetuity. The commenter also notes that development is largely prohibited in these preserve areas as Hardline Preserves and conservation banks are areas that are already preserved to Subarea Plan standards. The commenter also states that the application of Subarea Plan standards would occur as development applications are processed and development design plans are formulated and notes the Subarea Plan standards are currently being updated.

The comment provides background information, recites information included in the Draft EIR, and does not raise a comment related to the adequacy of the Draft EIR. In regard to a portion of the site designated Hardline Preserve by the Subarea Plan, please refer to Response to Comment I27-4. While

the Subarea plan was prepared and is used as a guidance document for development projects in the City, it has not yet been adopted by the Oceanside City Council or permitted by the wildlife agencies. Further, the Subarea Plan acknowledges that areas of designated preserve can overlap with private ownership; therefore, the boundaries of the preserve may be revised on a project-by-project basis (City of Oceanside 2010). The comment does address the adequacy of the Draft EIR. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

06-4 This comment states that proposed housing footprint overlaps with on-site sensitive habitat and would result in significant impacts to "occupied" coastal sage scrub habitat and grasslands.

The comment recites information provided in the Draft EIR. The Draft EIR evaluates impacts to sensitive habitats, including coastal sage scrub and non-native grasslands in Section 4.3, Biological Resources. As discussed on page 4.3-18, direct permanent impacts to non-native grassland and coastal sage scrub communities would be significant and require mitigation, per Draft EIR Table 5-2, Mitigation Standards for Impacts to Natural Vegetation and Habitat, in the Subarea Plan (City of Oceanside 2010). The permanent loss of these vegetation communities shall be mitigated to less than significant through the creation of coastal sage scrub within an off-site mitigation site, Quarry Creek (Mitigation Measure [MM]-BIO-1). Off-site mitigation at the Quarry Creek mitigation site has been identified in negotiations with permitting regulatory agencies as their preferred mitigation. Please also refer to Responses to Comments A3-12 and A3-13. This comment does not otherwise raise a substantive issue on the content of the Draft EIR and revisions to the Draft EIR are not necessary. This comment is noted for the administrative record and included in the Final EIR for review and consideration by the decision-makers as part of the decision to approve or deny the required discretionary permits for project implementation.

06-5 The commenter states the project would not provide the necessary 100-foot riparian buffer and the proposed 30-foot fuel modification zone (FMZ) would further limit the reduced buffer.

The comment recites information provided in the Draft EIR. Per Section 5.2.4 of the Subarea Plan (City of Oceanside 2010), a 50-foot-wide buffer biological buffer and 50-foot-wide planning buffer (total width of both equals 100 feet) are recommended from the southern edge of the riparian forest and southern willow riparian forest. Table 4.3-5 under Section 4.3.4 of the EIR provides an analysis of the proposed projects overlap with the 100-foot buffer. Please refer to Response to Comment A3-20 above for responses related to permanent biological impacts within the FMZs. Although the project would not provide the full 100-foot-wide buffer, project development has been sited to ensure all direct impacts to wetlands/riparian areas are eliminated. The areas within the 100-foot buffer include slopes that could be planted with drought-tolerant native species as long as they meet the FMZ requirement. In addition, the existing house located within the Subarea Plan buffer will be demolished as a part of project construction. Per Subarea Plan requirements, all areas of non-native vegetation and developed areas within the buffer will be landscaped with native vegetation (MM-BIO-2). Therefore, although a full 100-foot buffer will not be provided per the Subarea Plan, the buffer will be enhanced with native vegetation, providing for an improved buffer condition.

06-6 The commenter states the project does not include permanent fencing of the sensitive habitat or provide ongoing monitoring and maintenance by a responsible third party as the project's Home

Owners Association (HOA) arrangements are not adequate in their opinion. Refer to Response to Comment A3-43. Although fencing is discussed on page 4.3-21 in Draft EIR Section 4.3, Biological Resources, text revisions have been made to ensure that the fencing is described adequately in Draft EIR Section 3.2.5, Project Design Features, to include a specific fencing project design feature. Revisions to Draft EIR Chapter 3, Project Description, and Section 4.3, Biological Resources are shown as ~~strikeout~~/underline in Chapter 3, Errata, of the Final EIR to further clarify fencing proposed between proposed development and the open space area. Please refer to Response to Comment O2-83 regarding monitoring and management measures and potential requirements for the onsite preserved habitat.

O6-7 The commenter requests the project address indirect impacts to the protected riparian area, and suggests measures including deflected lighting, provisions for invasive landscaping, protection from domestic cats, and bird-proof windows.

Refer to Comment A3-43 regarding preservation of the riparian area. Refer to MM-BIO-2 (see Draft EIR Section 4.3, Biological Resources), which prevents invasive species from being included in project landscaping. For discussion on shielding of outdoor lighting from adjacent open space areas, refer to Responses to Comments O2-39 and A2-15. Refer to Response to Comment O4-5 above, which addresses domestic cat concerns by adding a project design feature (PDF-BIO-2) has been added to Draft EIR Chapter 3, Project Description, under Section 3.2.5.5 of the EIR that requires the HOA to establish an education program for homeowners regarding responsible pet ownership (i.e., encourages keeping pets indoors, especially at night; having pets neutered or spayed; belling of cats to reduce their effectiveness as predators; and prohibiting release of unwanted pets into the wild). Bird proof windows are not proposed for this project as there are no industry standards or City requirements related to bird proof windows used for development. The proposed design of the single-family homes would not be of a type that would encourage bird strikes in contrast to other residential facades, such as tall, glass-clad apartment buildings.

O6-8 The commenter notes the project could have been designed to avoid all onsite habitat per the Subarea Plan in lieu of mitigating off-site. Refer to Comments A3-9 and A3-10 regarding the alternatives analysis presented in the EIR, which addresses this issue.

O6-9 The commenter indicates the mitigation includes creation of habitat described as "Quarry Creek mitigation site" which is outside the Wildlife Corridor Planning Zone designated in the Subarea Plan for coastal sage scrub mitigation. The comment is referring to MM-BIO-1 (Draft EIR, p. 4.3-24), as it proposes mitigation outside the Wildlife Corridor Planning Zone per the Subarea Plan. In response, the "Quarry Creek mitigation site" is an established off-site mitigation site, which has its own management system and has been previously approved. This site has been recommended by permitting agencies to act as off-site mitigation for the proposed project (refer to Responses to Comments A3-12 and A3-13). Since there is no Implementing Agreement between the City and the wildlife agencies for the Subarea Plan, the mitigation ratios provided in the plan are used as a guidance by the City for determining appropriate mitigation. Since the Subarea Plan has not been adopted, take of habitat for coastal California gnatcatcher (i.e., coastal sage scrub) will need to be granted through the Section 10 consultation process with the U.S. Fish and Wildlife Service (USFWS) (MM-BIO-11). A Habitat Conservation Plan (HCP) will be prepared as part of the Section 10 consultation process and will include details regarding off-site mitigation. The USFWS will review and must approve the HCP and associated mitigation proposal prior to the issuance of grading permits.

06-10 The commenter states the proposed 2:1 mitigation for the loss of coastal sage scrub does not meet the required 3:1 ratio stipulated in the Subarea Plan and no provision is made for a wildlife corridor from the project site to open space in the Regional Park.

As discussed in Draft EIR Section 4.3, Biological Resources, the project site is within an Off-Site mitigation zone, and the 2:1 mitigation ratio for coastal sage scrub is consistent with the Subarea Plan's requirements (Draft EIR, p. 4.3-18). Please refer to Response to Comment A3-12 for additional discussion regarding mitigation of permanent, direct impacts to coastal sage scrub. Please refer to Responses to Comments A3-15 through A3-17 for a detailed discussion of wildlife movement and corridors. The riparian corridor associated with the creek would be avoided, thus allowing for any potential wildlife movement throughout the site to the regional park.

06-11 The commenter suggests the project would not comply with standards in the Equestrian Overlay Zone resulting in an impact. In response to the commenters concern that requested waivers to the Equestrian Overlay Zone would result in impacts, refer to Responses to Comments O5-3 through O5-5 above.

06-12 The commenter suggests the project would result in impacts to Guajome Lake Regional Park resulting from non-compliance with standards in the "Special Park Overlay Zone" with regard to grading limitations, view preservation, building height, air quality, access limitations, etc. The commenter is likely referring to the "Scenic Park Overlay District." The project does not request any waivers from the Scenic Park Overlay District requirements. Refer to Responses to Comments O2-30 and O5-5 above, addressing the proposed project's consistency with development standards of the Scenic Park Overlay District.

06-13 The commenter suggests that growth inducement and cumulative impacts would result from the proposed project's extension of utilities and road improvements.

In response, the project proposes a private sewer system that would connect to the existing City sewer infrastructure located in Old Ranch Road, northwest of the project and would connect to San Diego Gas & Electric electricity and natural gas lines also available in nearby roads. It is typical to have "islands" of land in rural as well as urban areas that have not yet been connected to existing utility infrastructure. As such, existing public services and utilities and service systems would serve the project, as analyzed in Sections 4.13, Public Services, and 4.17, Utilities and Service Systems. As described in Draft EIR Section 4.12, Population and Housing, the increase in population growth at the project site is anticipated by and accounted for in the City's General Plan Land Use Element and Housing Element based on the site's existing land use designation of SFD-R (Single-Family Detached Residential) and zoning designation of RS-SP-EQ (Single Family Residential – Scenic Park Overlay – Equestrian Overlay). This growth meets the applicable General Plan goals and policies, specifically Policy 3.5, which encourages development of low and moderate housing opportunities, and Policy 3.7, which encourages disbursement of low- and moderate-income housing throughout the City (Draft EIR, p. 4.12-9).

As described in Draft EIR Chapter 3, project implementation would include improving Guajome Lake Road along the project frontage and extending northwest to connect to Albright Street, approximately 1,200 linear feet, to current City roadway and fire code standards. The project would not construct any new roads off-site or extend any existing roads that could be considered growth inducing. The potential for the project to be growth inducing is addressed in Chapter 7, Other CEQA Considerations.

As discussed, starting on page 7-1, the project would directly facilitate growth through development of residential units, which would introduce new residents or relocate existing residents within the area, but would not introduce a new population beyond what is planned for in the City and the region. Lastly, the project would not lead to indirect growth because the project would not provide for additional infrastructure improvements that would allow for additional unplanned growth in the area. The project would not result in significant adverse environmental impacts beyond those analyzed in this EIR due to the expansion of infrastructure, such as water supply facilities, wastewater treatment plants, roads, or freeways (Draft EIR, p. 7-2).

The project's cumulative impacts are evaluated in Chapter 6, Cumulative Effects. The proposed project's off-site improvements would involve comparable construction activities to what was studied for on-site construction; therefore, potential temporary construction impacts from the proposed off-site sewer system improvements would not create a new or significant impact under CEQA than what was evaluated in the Draft EIR, including impacts related to air quality, biological resources, cultural resources, noise or in any other environmental resource areas.

O6-14 The commenter suggests that the project would result in poor traffic circulation and access in the area due to limits present in the existing roads and a lack of analysis of existing traffic circulation. Please refer to Responses to Comments I1-2 and I1-3, addressing concerns associated with traffic that would be generated on Guajome Lake Road due to project implementation. Also refer to Response to Comment I2-5, addressing air quality impacts, in regard to dust concerns, as a result of additional vehicle trips on the dirt road southeast of the project site.

O6-15 The commenter suggests that the Draft EIR provides an inadequate analysis of greenhouse gas (GHG) emissions and the project does not comply with the City's Climate Action Plan (CAP). The commenter also suggests that the project would result in significant impacts based on non-compliance with the vehicle miles traveled (VMT)/capita threshold which upon project completion in 2027, would be required to decrease from the threshold in 2024.

Regarding the concern that project completion date could change the threshold for project's VMT in the air quality analysis, refer to Response to Comment O2-56 above. Please refer to Response to Comment O2-73 above for discussion related to the VMT and GHG analysis. As discussed in Section 4.7, Greenhouse Gases, the proposed project would generate GHG emissions associated with construction activities and project operation. As explained on page 4.7-22 of the Draft EIR, the City's CAP relies on a screening threshold based on land use size and a CAP Consistency Checklist to determine whether a project's emissions would be consistent with GHG emissions estimated within the CAP. The City uses a threshold of 900 metric tons (MT) carbon dioxide equivalent (CO_2e) annually, with construction-related emissions amortized over 20 years. New development projects emitting less than 900 MT CO2e annual GHG would not contribute considerably to cumulative climate change impacts and therefore do not need to demonstrate consistency with the CAP. Projects with emissions greater than 900 MT CO2e would be required to show CAP Checklist consistency. As shown in Table 4.7-3, the project's construction emissions amortized over 20 years would be 38.24 MT CO2e per year, which is less than the City's 900 MT CO2e threshold (Draft EIR, p. 4.7-22). As shown in Draft EIR Table 4.7-4 on page 4.7-24, the project's estimated annual GHG emissions during operations would be approximately 1,158 MT CO2e per year, which exceeds the City's threshold triggering preparation of a CAP Consistency Checklist. Draft Table 4.7-5 on page 4.7-25 of the Draft EIR provides an analysis of the project's consistency with the City's five checklist questions. Based on the analysis it was determined

that implementation of the project would not generate substantial GHG emissions and the impact would be less than significant. The Draft EIR provides a comprehensive and quantitative analysis of the project's GHG emissions and consistency with the City's CAP requirements.

06-16 The commenter suggests post-project drainage described (in the Draft EIR) is not consistent with the Preliminary Hydrology Study (Appendix H).

The commenter does not provide any further clarification on specifically how the analysis in the Draft EIR is inconsistent with the project's Preliminary Hydrology Study (Appendix H). However, please refer to Response to Comment O2-122 for discussion on the description of direction of existing surface drainage between the preliminary Geotechnical Evaluation (Appendix G) and Preliminary Hydrology Study (Appendix H) prepared for the project. This comment does not otherwise raise a substantive issue on the adequacy of the Draft EIR and revisions to the Draft EIR are not necessary.

06-17 The commenter provides a brief description of the Townhouse Alternative (Alternative 3) and states that it is the environmentally superior alternative but indicates the design of the townhouse development is not described in the Draft EIR and it would result in some of the same impacts as the proposed project.

In response, refer to Response to Comment O2-145 above. The description of the Townhome (Coastal Sage Scrub Impact Avoidance) Alternative is included on page 8-9 of the Draft EIR. Specifically, this alternative is described as a townhome development on approximately 5.98 acres, including 90 townhome units, each ranging from approximately 1,400 to 1,800 square feet and extending up to three stories. The amount of site disturbance would decrease from 8.96 acres under the proposed project to 5.98 acres and does not include any recreational amenities on site. An analysis of the comparative effects of this alternative as compared to the proposed project is provided on pages 8-9 through 8-10 of the Draft EIR. Only those impacts that differ from the proposed project are discussed. The remaining impacts identified under the proposed project would remain the same under this alternative.

06-18 The commenter provides closing statements stating general opposition to the proposed project due to impacts to biological resources, the need for wildlife linkages to Guajome Regional Park, and land use and other environmental impacts. Additionally, the commenter provides general support for an environmentally superior alternative but requests further analysis of potential environmental impacts before any project should be approved for this property. Please refer to responses to comments O6-2 through O6-17 to address concerns regarding the adequacy of the environmental analysis conducted for the project. The City acknowledges the comment as a closing statement to the letter. No further response is required or necessary.

3 Errata

Changes to the Draft Environmental Impact Report (Draft EIR) are noted below. An underline indicates additions to the text; ~~strikeout~~ indicates deletions to the text. Changes have been responded to in Chapter 2, Response to Comments. The changes to the Draft EIR do not affect the overall conclusions of the environmental document. Changes are listed by page, Chapter or Section, and where appropriate, by paragraph.

These errata address the technical comments on the Draft EIR which circulated for public review from November 20, 2024, through January 10, 2025, in accordance with Section 15105(a) of the California Environmental Quality Act (CEQA) Guidelines. These revisions are not considered to result in any new or substantially greater significant impacts as compared to those identified in the Draft EIR. None of the revisions constitutes significant new information or substantial Project changes that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

3.1 Edits made to Chapter ES, Executive Summary

Page ES-1, Section ES2.1, Project Location

The proposed site consists of a mostly vacant parcel (Assessor's Parcel Number 157-412-1500) and includes approximately 16.78 acres in the Guajome Neighborhood Area of the City of Oceanside, California (Figure 3-1, Project Location). The proposed project site is located along the north side of Guajome Lake Road southeast of Albright Street in the east-central portion of the City. The City of Vista municipal boundary is located approximately 0.~~1~~5 miles east of the project site. The project site is located approximately 0.5 miles south of State Route 76 and approximately 3.4 miles north of State Route 78. The project site is surrounded by residential development and open space (Figure 3-2, Existing Project Site).

Page ES-2, Section ES2.2, Project Description

The proposed project would involve a request for approval of a development plan, tentative map, and density bonus to allow for the construction of 83 single-family homes on approximately 9.86 acres of the 16.78-acre project site. The project would also include approximately 35,151 square feet of private recreational and amenity area within the development. The project is subject to state Density Bonus Law (Government Code Section 65915) and local density bonus provisions (Section 3032 of the Zoning Ordinance). The General Plan designation for the project site is Single-Family Detached Residential (SFD-R), with a zoning designation of Single-Family Residential – Scenic Park Overlay and Equestrian Overlay (RS-SP-EQ). Four of the proposed 83 single-family homes (5% of the total) would be designated as deed-restricted affordable housing. The remaining 79 homes would be sold at market rate. The proposed affordable homes would be distributed evenly throughout the community. In order to accommodate the project as allowed under state Density Bonus Law, the project cannot physically comply with all of the development standards that apply to standard single-family residential projects. Based on the proposed design to accommodate density bonus units, the project anticipates seeking waivers of development standards, including reduction of lot sizes, removal of equestrian development standards, reduction or redistribution of setbacks, reduction of open space/landscape minimums, increase of floor area ratio per lot, and increase of retaining wall heights. The average proposed lot sizes would be approximately 3,200 square feet, with homes ranging in size from 1,869 to 2,220 square feet. Primary access to the project site would be from Guajome Lake Road, which would be improved as part of the project. Guajome Lake Road would be improved

the length of the property frontage, connecting to Albright Street. Road improvements would include 40-foot-wide curb to curb improvements, including a ~~5.5~~5-foot-wide parkway and a ~~4.5~~5-footwide sidewalk. The internal private road would be 28–32 feet wide with 5-foot-wide sidewalks. Each proposed home would include a two-car garage and a private driveway that would allow for parking of an additional two cars. All homes would be developed on the southern portion of the project site, which has been previously disturbed and graded. The project would avoid the northernmost portion of the project site along the riparian corridor, preserving approximately ~~3.77~~6.92 acres of the 16.78-acre project site as open space. In Existing Conditions, the project site is mostly vacant and previously disturbed, with one existing vacant structure in the northern portion of the property.

Page ES-5 through ES-14, Section ES.5, Impacts Determined to be Significant

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
Air Quality			
Impact AQ-1: The project would result in significant impacts related to emissions of criteria air pollutant emissions during construction	MM-AQ-1	**Require Low-Volatile Organic Compound Coatings During Construction.** The project applicant and/or their contractors shall ensure that low-volatile organic compound (VOC) coatings with a VOC content of 50 grams per liter or less are used during construction.	Less than significant
Impact AQ-2: The project would exceed the SDPACD VOC emissions threshold largely because of area source emissions from wood fireplaces	MM-AQ-2	**Wood Burning Stoves and Fireplaces.** No wood burning stoves or fireplaces shall be constructed as part of the project.	Less than significant
Biological Resources			
Impact BIO-1: The project would result in direct impacts to special-status vegetation communities	MM-BIO-1	**Off-Site Mitigation Credits.** In order to mitigate for the loss of 1.25 acres of coastal sage scrub and 8.29 acres of non-native grassland, 2.5 acres of coastal sage scrub and 4.14 acres of non-native grassland are required. The project applicant will create 6.64 acres of coastal sage scrub at the Quarry Creek mitigation site.	Less than significant

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
Impact BIO-2: The project would result in the permanent loss of 1.98 acres of habitat utilized by coastal California gnatcatcher as well as 8.29 acres of potential foraging habitat for white-tailed kite.	MM-BIO-1 (outlined above)		Less than significant
	MM-BIO-2	**Landscaping.** The applicant shall ensure that development landscaping adjacent to on- or off-site habitat does not include exotic plant species that may be invasive to native habitats. Exotic plant species not to be used include any species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" List. This list includes such species as pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained from Cal-IPC's web site or other similar sources that may evolve over the life of this plan. In addition, landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to the Preserve and water runoff from landscaped areas should be directed away from the open space areas and contained and/or treated within the development footprint. Landscaping within the Subarea Plan buffers will consist of native species. The applicant shall ensure that development lighting adjacent to all on- or off-site habitat shall be directed away from and/or shielded so as not to illuminate native habitats.	
	MM-BIO-3	**Temporary Installation Fencing.** The project applicant shall temporarily fence (with silt barriers) the limits of project impacts (including construction staging areas and access routes) to prevent additional habitat impacts and prevent the spread of silt from the construction zone into adjacent native habitats to be preserved. Fencing shall be installed in a manner that does not impact habitats to be preserved. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the Wildlife Agencies. Any riparian/wetland or upland habitat impacts that occur beyond the approved fenced shall be mitigated at a minimum 5:1 ratio. Temporary construction fencing shall be removed upon project completion.	Less than significant
	MM-BIO-4	**Environmental Awareness Training.** A Workers Environmental Awareness Training Program shall be implemented with the contractor and all active construction personnel prior to construction to ensure knowledge of sensitive wildlife that may occur on site, including coastal California gnatcatcher (*Polioptila californica californica*) and least Bell's vireo (*Vireo bellii pusillus*) and their habitat, and general compliance with environmental/permit regulations and mitigation measures. At a minimum, training shall include a discussion of the following topics: (1) the purpose for resource protection; (2) descriptions of coastal California gnatcatcher and least Bell's	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
		vireo and their habitat; (3) the mitigation measures outlined in this report that should be implemented during Project construction to conserve sensitive resources, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced area to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps and on the Project site by fencing); (4) environmentally responsible construction practices; (5) the protocol to resolve conflicts that may arise at any time during the construction process; and, (6) the general provisions of the federal Endangered Species Act (FESA), the need to adhere to the provisions of FESA, and the penalties associated with violating FESA.	
	MM-BIO-5	**Work Hours.** Project construction shall occur during daylight hours. However, if temporary night work is required, night lighting shall be of the lowest illumination necessary for human safety, selectively placed, shielded, and directed away from natural habitats.	
	MM-BIO-6	**Construction Best Management Practices.** The Project applicant shall ensure that the following conditions are implemented during Project construction to minimize potential impacts to sensitive vegetation and species: 1. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint; 2. To avoid attracting predators of covered species, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site; 3. Pets of project personnel shall not be allowed on the project site; 4. Disposal or temporary placement of excess fill, brush or other debris shall not be allowed in waters of the United States or their banks; 5. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas outside of waters of the United States within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering waters of the United States, and shall be shown on the construction plans. Fueling of equipment shall take place within existing paved areas greater than 100 feet from waters of the United States. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. “No-fueling zones” shall be designated on construction plans.	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
	6. Impacts from fugitive dust shall be avoided and minimized through watering and other appropriate measures consistent with the Construction General Permit Order 2009-009-DWQ.	
	MM-BIO-7 **Biological Monitor Requirements and Duties. A** qualified biologist shall be on site daily during initial clearing/grubbing and weekly during grading activities within 500 feet of preserved habitat to ensure compliance with all Project-imposed mitigation measures. The biologist shall be available during pre-construction and construction phases to review grading plans, address protection of sensitive biological resources, monitor ongoing work, and maintain communications with the Project's engineer to ensure that issues relating to coastal California gnatcatcher, least Bell's vireo, and their habitat are appropriately and lawfully managed. The biological monitor should flush birds out of habitat areas before they are cleared. The qualified biological monitor shall also be responsible for the following duties: 1. Oversee installation of and inspect temporary fencing and erosion control measures within or up-slope of avoided and/or preserved areas a minimum of once per week during installation and daily during all rain events until established to ensure that any breaks in the fence or erosion control measures are repaired immediately. 2. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust. 3. Halt work, if necessary, and confer with the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and City of Oceanside (City) to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to USFWS, CDFW, and the City within 24 hours of its occurrence. 4. Submit weekly letter reports (including photographs of impact areas) via email to the City during clearing/grubbing of potential habitat and/or Project construction resulting in ground disturbance within 500 feet of avoided potential habitat. The weekly reports shall document that authorized impacts were not exceeded and general compliance with all conditions. The reports shall also outline the duration of monitoring, the location of construction activities, the type of construction that occurred, and equipment used. These reports shall specify numbers and locations of any coastal California gnatcatchers/least Bell's vireo and nests, sex, observed behavior (especially in relation to	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
	construction activities), and remedial measures employed to avoid, minimize, and mitigate impacts to coastal California gnatcatchers/least Bell's vireo and nests. 5. Submit a final report to the City within 60 days of Project completion that includes the following: (1) as-built construction drawings for grading with an overlay of any active nests; (2) photographs of habitat areas during pre-construction and post-construction conditions; and (3) other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with the avoidance/minimization provisions and monitoring program as required by USFWS and CDFW were achieved.	
MM-BIO-8	**Breeding Season Avoidance.** The removal of vegetation from the project impact footprint shall occur only during September 1 through February 14 to avoid the bird breeding season. Further, to the maximum extent practicable, grading activities associated with construction of the project shall occur September 1 through February 14 to avoid the breeding season. If project construction must occur during the breeding season, ~~MM-BIO-8 and~~ MM-BIO-9 shall be implemented.	
MM-BIO-9	~~General~~ **Pre-construction Surveys.** ~~Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season.~~ **General Pre-construction Survey.** Within 72 hours of Project related activities, a qualified biologist with the appropriate handling permits shall conduct a survey to determine the presence of potential rare, listed, or other special status wildlife species. The qualified biologist shall survey the proposed impact areas and a 50-foot buffer. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, or in loose soil. Should a special-status species be located in the Project site during pre-activity surveys all individuals shall be documented and locations of presence recorded. If a special-status species is found, the qualified biologist shall contact the Wildlife Agencies, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall obtain all appropriate permits and prepare a species-specific	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
	list (or plan) of proper handling and passive relocation protocols. The list (or plan) of protocols shall be implemented during Project construction and activities/biological construction monitoring. **Nesting Bird Survey.** To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat will occur outside of the breeding season (February 15 to August 31). Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a City of Oceanside (City)-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 300 feet of the construction area, and federally- or State-listed birds and raptors on or within 500 feet of the construction area. The pre-construction survey must be conducted within ~~10~~3 calendar days prior to the start of construction, the results of which must be submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected by the City-approved biologist, the following buffers shall be established: (1) no work within 300 feet of a non-listed nesting migratory bird nest, and (2) no work within 500 feet of a listed bird or raptor nest. However, the City may reduce these buffer widths depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant will contact the City and Wildlife Agencies to determine the appropriate buffer. ~~**Coastal California Gnatcatcher Survey.** A biologist holding a Section 10(a)(1)(A) permit shall perform a minimum of three focused surveys, on separate days, to determine the presence of coastal California gnatcatcher (*Polioptila californica californica*) nests within 500 feet of Project grading activities~~	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
	~~if construction is proposed during the coastal California gnatcatcher breeding season. The surveys shall begin a maximum of 7 days prior to Project construction (including temporary fence installation required by MM BIO-3), and one survey shall be conducted the day immediately prior to the initiation of work. Additional surveys shall be done once a week during Project grading activities during the breeding season.~~ Crotch's Bumble Bee Pre-Construction Survey. If Crotch's bumble bee is no longer a Candidate or formally Listed species under the CESA at the time ground-disturbing activities occur, then no additional protection measures are proposed for the species. If the Crotch bumble bee is legally protected under the CESA as a Candidate or Listed species at the time ground-disturbing activities are scheduled to begin, a pre-construction survey for Crotch's bumble bee shall be conducted within the construction footprint plus a 50-foot buffer, where accessible, prior to the start of ground-disturbing construction activities occurring during the Crotch's bumble bee nesting period (February 1 through October 31). The pre-construction survey shall include a habitat assessment and focused surveys, both of which shall be based on recommendations described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current version at the time ground-disturbing activities are scheduled to begin. The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat on site, including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and human-made structures that may support bumble bee colonies such as rock walls, rubble, and furniture. The habitat assessment shall be repeated prior to February 1 in each year ground-	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
	disturbing activities occur to determine if nesting resources are present within the on-site and/or off-site impact areas. If nesting resources are found to be present in the on-site and/or off-site impact areas based on the habitat assessment, focused surveys shall be conducted. The focused surveys shall be performed by a biologist with expertise in surveying for bumble bees and include at least three survey passes that are not on sequential days or in the same week, preferably spaced 2 to 4 weeks apart. The timing of these surveys shall coincide with the colony active period (April 1 through August 31 for Crotch's bumble bee). Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling), and surveyors shall wait at least 1 hour following rain. Optimal surveys are when there are sunny to partly sunny skies and a temperature greater than 60°F. Surveys may be conducted earlier if other bees or butterflies are flying. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 miles per hour). Within non-developed habitats, the biologist shall look for nest resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the biologist shall watch the nest resources for up to 5 minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after 5 minutes of observation. If a bumble bee worker is detected, then a representative shall be identified to species. Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them, depending on their proximity to one another. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point to determine which would provide 100% visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes). Identification shall include trained biologists netting/capturing the representative bumble bee in	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
	appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees. The bee shall be placed in a clear container for observation and photographic documentation, if able. The bee shall be photographed using a macro lens from various angles to ensure recordation of key identifying characteristics. If bumble bee-identifying characteristics cannot be adequately captured in the container due to movement, the container shall be placed in a cooler with ice until the bumble bee becomes inactive (generally within 15 minutes). Once inert, the bumble bee shall be removed from the container and placed on a white sheet of paper or card for examination and photographic documentation. The bumble bee shall be released into the same area from which it was captured upon completion of identification. Based on implementation of this method on a variety of other bumble bee species, they become active shortly after removal from the cold environment, so photography must be performed quickly. If Crotch's bumble bee nests are not detected, no further mitigation would be required. The mere presence of foraging Crotch's bumble bees would not require implementation of additional minimization measures because they can forage up to 10 kilometers from their nests. If nest resources occupied by Crotch's bumble bee are detected within the construction area, no construction activities shall occur within 100 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources shall be avoided for the duration of the Crotch's bumble bee nesting period (February 1 through October 31). Outside of the nesting season, it is assumed that no live individuals would be present within the nest because the daughter queens (gynes) usually leave by September, and all other individuals (original queen, workers, males) die. The gyne is highly mobile and can independently disperse to outside of the construction footprint to surrounding open space areas that support suitable hibernacula resources. A written survey report shall be submitted to the City of Oceanside and CDFW within 30 days of the pre-construction	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
	survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. If Crotch's bumble bee nests are observed, the survey report shall also include recommendations for avoidance, and the location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report. If Crotch's bumble bee is detected within the project site, the project applicant shall consult with CDFW regarding the need to obtain an Incidental Take Permit. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch's bumble bee may supersede measures provided in this document and shall be incorporated into the habitat mitigation and monitoring plan. In the event that an Incidental Take Permit is needed, mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process.	
	MM-BIO-10 **California Gnatcatcher Nest Avoidance and Minimization Measures.** If an active coastal California gnatcatcher (*Polioptila californica californica*) nest is found on site or within 500 feet of Project grading activities, the biologist shall postpone work within 500 feet of the nest and contact the U.S. Fish and Wildlife Service (USFWS) and the City of Oceanside to discuss (1) the best approach to avoid/minimize impacts to nesting coastal California gnatcatchers (e.g., sound walls, noise monitoring); and (2) a nest monitoring program acceptable to USFWS. Subsequent to these discussions, work may be initiated subject to implementation of the agreed-upon avoidance/minimization approach and monitoring program. If the biologist determines that bird breeding behavior is being disrupted, the Project applicant shall stop work and coordinate with USFWS to review the avoidance/minimization approach. Upon agreement as to any necessary revisions to the	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
		avoidance/minimization approach, work may resume subject to the revisions and continued monitoring. Success or failure of an active nest shall be established by regular and frequent trips to the site, as determined by the biologist and through a schedule approved by the wildlife agencies. Monitoring of an active nest shall continue until fledglings have dispersed or the nest has been determined to be a failure, as approved by USFWS.	
Impact BIO-3: Indirect impacts to vegetation during construction	**MM-BIO-4 (outlined above)**		
Impact BIO-4: The project would have potentially significant impacts to sensitive biological resources	**MM-BIO-1 through MM-BIO-10 (outlined above)** **MM-BIO-11**	**Section 10 Consultation.** All terms and conditions developed as part of the Section 10 consultation process with the U.S. Fish and Wildlife Service (USFWS) and provided in the project's Habitat Conservation Plan (HCP) shall be implemented. Terms and conditions shall apply to federally listed species that may be impacted by the project.	
Cultural Resources			
Despite no significant archaeological resources being identified within the project site, to further ensure project development would not result in potential impacts to cultural resources, the project would implement the City's standard cultural	**MM CUL-1**	Prior to the issuance of a Grading Permit, the Applicant/Owner shall enter into a pre-excavation agreement, otherwise known as a Tribal Cultural Resources Treatment and Tribal Monitoring Agreement with the Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Luiseño Tribe. A copy of the agreement shall be included in the Grading Plan Submittals for the Grading Permit. The purpose of this agreement shall be to formalize protocols and procedures between the Applicant/Owner and the Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Luiseño 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 tribal cultural resources, 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. Through consultation with the Tribes that consulted on the project and with their consent, certain artifacts may be made available for 3D scanning/printing,	Less than significant

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
mitigation measures.		with scanned/printed materials to be curated at a local repository meeting the federal standards of 36CFR79.	
	MM CUL-2	Prior to the issuance of a Grading Permit, the Applicant/Owner or Grading Contractor shall provide a written and signed letter to the City of Oceanside Planning Division stating that a Qualified Archaeologist and Luiseño Native American Monitor have been retained at the Applicant/Owner or Grading Contractor's expense to implement the monitoring program, as described in the pre-excavation agreement.	
	MM CUL-3	The Qualified Archaeologist shall maintain ongoing collaborative consultation with the Luiseño Native American monitor during all ground disturbing activities. The requirement for the monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall notify the City of Oceanside Planning Division of the start and end of all ground disturbing activities.	
	MM CUL-4	The Qualified Archaeologist and Luiseño Native American Monitor shall attend all applicable pre-construction meetings with the General Contractor and/or associated Subcontractors to present the archaeological monitoring program. The Qualified Archaeologist and Luiseño Native American Monitor shall be present on-site full-time during grubbing, grading and/or other ground altering activities, including the placement of imported fill materials or fill used from other areas of the project site, to identify any evidence of potential archaeological or tribal cultural resources. All fill materials shall be absent of any and all tribal cultural resources.	
	MM CUL-5	In order for potentially significant archaeological artifact deposits and/or cultural resources to be readily detected during mitigation monitoring, a written "Controlled Grade Procedure" for CA-SDI-5345 shall be prepared by a Qualified Archaeologist, in consultation with the other TCA Luiseño Tribes that have participated in the state-prescribed process for this project, and the Applicant/Owner, subject to the approval of City representatives. The Controlled Grade Procedure shall establish requirements for any ground disturbing work with machinery occurring in and around areas the Qualified Archaeologist and Luiseño Native American monitor determine to be sensitive through the cultural resource mitigation monitoring process. The Controlled Grade Procedure shall include, but not be limited to, appropriate operating pace, increments of removal, weight and other characteristics of the earth disturbing equipment. A copy of the Controlled Grade Procedure shall be included in the Grading Plan Submittals for the Grading Permit.	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
	MM CUL-6	The Qualified Archaeologist or the Luiseño Native American Monitor may halt ground disturbing activities if unknown Tribal Cultural Resources, or non-Tribal unique archaeological resources as defined in CEQA Guidelines section 15064.5 (artifact deposits or cultural features or artifacts) are discovered. Ground disturbing activities shall be directed away from these deposits to allow a determination of potential importance. Isolates and clearly non-significant deposits ~~will~~ shall be minimally documented in the field, and before grading proceeds these items shall be secured until they can be repatriated. If items cannot be securely stored on the project site, they may be stored in off-site facilities located in San Diego County. If the Qualified Archaeologist and Luiseño Native American monitor determine that the unearthed tribal cultural resource, or non-Tribal unique archaeological resources (artifact deposits, or cultural features or artifacts) are considered potentially significant TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the respectful and dignified treatment of those resources. The avoidance and protection of the significant tribal cultural resource and/or unique archaeological resource is the preferable mitigation. If, however, it is determined by the City that avoidance of the resource is infeasible, and it is determined that a data recovery plan is necessary by the City as the lead agency under CEQA, TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the drafting and finalization of any such recovery plan. For significant Tribal Cultural Resources, or non-Tribal unique archaeological resources (artifact deposits, or cultural features or artifacts) artifact deposits or cultural features that are part of a data recovery plan, an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods. The data recovery plan shall also incorporate and reflect the tribal values of the TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project. If the Qualified Archaeologist collects such resources, the Luiseño Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the Tribal Cultural Resources that are unearthed during the ground disturbing activities, the Luiseño Native American monitor, may at their discretion, collect said resources and provide them to the appropriate TCA Luiseño Tribe, as determined through the appropriate process, for respectful	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
		and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Ground disturbing activities shall not resume until the Qualified Archaeologist, in consultation with the Luiseño Native American Monitor, deems the cultural resource or feature has been appropriately documented and/or protected. Non-Tribal unique archaeological resource materials shall be collected and stored by the Qualified Archaeologist in offsite facilities located in San Diego County until the non-Tribal unique archaeological resources are curated at an appropriate qualified repository in San Diego County that meets federal standards per 36 CRF Part 79.	
	MM CUL-7	The landowner shall relinquish ownership of all tribal cultural resources unearthed during the cultural resource mitigation monitoring conducted during all ground disturbing activities, and from any previous archaeological studies or excavations on the project site to the appropriate TCA Luiseño Tribe, as determined through the appropriate process, for respectful and dignified treatment and disposition, including reburial at a protected location on-site, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98. No tribal cultural resources shall be subject to curation.	
	MM CUL-8	Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusions of the archaeological monitoring program (e.g., data recovery plan) shall be submitted by the Qualified Archaeologist, along with the Luiseño Native American monitor's notes and comments, to the City of Oceanside Planning Division for approval.	
	MM CUL-9	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 Office of the Medical Examiner by telephone. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, 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. If suspected Native American remains are discovered,	

Table ES-1. Summary of Significant Environmental Impacts

Impact	Mitigation Measures		Level of Significance After Mitigation
		the 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 Luiseño Native American monitor. By law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner identifies the remains to be of Native American ancestry, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall make a determination as to the Most Likely Descendent.	
Geology and Soils			
Impact GEO-1: The project could result in potential damage to paleontological resources during construction	MM-GEO-1	**Paleontological Resources Impact Mitigation Program and Paleontological Monitoring.** Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The qualified paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project that shall be consistent with the SVP (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. The PRIMP shall also include a statement that any fossil lab or curation costs (if necessary due to fossil recovery) are the responsibility of the project proponent. A qualified paleontological monitor shall be on site during initial rough grading and other significant ground-disturbing activities in areas underlain by the Santiago Formation and below a depth of five feet below the ground surface in areas underlain by Holocene alluvium to determine if they are old enough to preserve scientifically significant paleontological resources. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will allow grading to recommence in the area of the find.	Less than significant

3.2 Edits made to Chapter 3, Project Description

Page 3-1 and 3-2, 3.2 Project Overview and Major Components

The proposed site consists of a mostly vacant parcel (Assessor's Parcel Number 157-412-1500) and includes approximately 16.78 acres located in the Guajome Neighborhood Area of the City of Oceanside, California (Figure 3-1, Project Location). The proposed project site is located along the north side of Guajome Lake Road southeast of Albright Street in the east-central portion of the City. The City of Vista municipal boundary is located approximately 0.~~1~~5 miles east of the project site. The project site is located approximately 0.5 miles south of State Route (SR) 76 and approximately 3.4 miles north of SR 78. The project site is surrounded by residential development and open space (Figure 3-2, Existing Project Site).

The proposed project would involve a request for approval of a development plan, tentative map, and density bonus to allow for the construction of 83 single-family homes on approximately 9.86 acres of the 16.78-acre project site. The project would also include approximately 35,151 square feet of private recreational and amenity area within the development, featuring common open space with lawn areas, a play area, and culinary lounge. The project is subject to the state Density Bonus Law (Government Code Section 65915) and local density bonus provisions (Section 3032 of the Zoning Ordinance).

The General Plan designation for the project site is Single-Family Detached Residential (SFD-R), with a zoning designation of Single-Family Residential – Scenic Park Overlay and Equestrian Overlay (RS-SP-EQ).

Four of the proposed 83 single-family homes (5% of the total) would be designated as deed-restricted affordable housing. The remaining 79 homes would be sold at market rate. The proposed affordable homes would be distributed evenly throughout the community. In order to accommodate the project as allowed under the Density Bonus Law, the project cannot physically comply with all of the development standards that apply to standard single-family residential projects. Based on the proposed design to accommodate density bonus units, the project anticipates seeking waivers of development standards, including reduction of lot sizes, equestrian development standards removed, reduction or redistribution of setbacks, reduction of open space/landscape minimums, increased floor area ratio per lot, and increase of retaining wall heights.

The average proposed lot sizes would be approximately 3,200 square feet, with homes ranging in size from 1,869 to 2,220 square feet. Primary access to the project site would be from Guajome Lake Road, which would be improved as part of the project. Guajome Lake Road would be improved over the length of the property frontage, connecting to Albright Street. Road improvements would include 40-foot curb to curb improvements, including a 5.~~0~~ foot parkway and a 5.~~0~~ foot sidewalk. The internal private road would be 28–32 feet wide with 5-foot-wide sidewalks. Each proposed home would include a two-car garage and a private driveway that would allow for additional parking of two more cars (Figure 3-3, Conceptual Site Plan).

All homes would be developed on the southern portion of the project site, which has been previously disturbed and graded. The project would avoid the northernmost portion of the project site along the riparian corridor, preserving approximately 6.92 acres of the 16.78-acre project site as open space. In existing conditions, the project site is mostly vacant and previously disturbed, with one existing vacant structure in the northern portion of the property. This existing structure would be removed with implementation of the proposed development.

~~Two~~ Three fuel modification zones (FMZs) would extend across the project site. This defensible space comprises an irrigated, well-maintained landscape that consists of fire-resistant plants within 30 feet of the building (Zone 1) and a

thinned landscape in the areas between 30 and 100 feet (Zone 2) from the structures (where applicable). The FMZs proposed for portions of this project are not standard Oceanside Fire Department widths, as some areas include reduced Zone 1 and/or Zone 2 areas and are less than 100 total feet within the property borders. These reductions are related to grading extents, portions of the FMZs extending into riparian forest protected areas, residential lot lines, or property boundaries that restrict Zone 1 and/or Zone 2. Additionally, a space extending 5 feet on a horizontal plane from the exterior wall surface of the buildings shall consist of continuous hardscape or limited fire-resistant plantings acceptable to the Fire Authority Having Jurisdiction (FAHJ). Vegetation in this space would not exceed 6 inches in height, and irrigation is required. Additionally, this space would be free of combustible materials, and the use of mulch is prohibited (Zone 0) (Appendix O).

Page 3-3, 3.2.1.1 Residential

The State of California's Density Bonus Law (Government Code Section 65915-65918) was established to promote the construction of affordable housing units and allows projects to exceed the maximum designated density and to use development standard waivers, reductions, or incentives and concessions in exchange for providing affordable housing units in compliance with all current density bonus regulations. The City implements these state requirements. Dwelling unit distribution and density bonus calculations for the proposed project are outlined below.

The General Plan designation of Single-Family Detached Residential (SFD-R) and a consistent zoning designation of RS-SP-EQ (Single-Family Residential – Scenic Park Overlay – Equestrian Overlay) allow for a ~~maximum~~ potential density of ~~up~~ 3.6 to 5.9 units per acre. Under the ~~Density Bonus Law~~ City's standard zoning calculus~~, where a density range is provided, the base number of units permitted is determined~~ the maximum density would be calculated by multiplying the *net* site acreage (12.45 acres[1]) by the maximum density for the specific zoning range and land use element of the General Plan applicable to the project (5.9 units per acre), allowing up to 74 units. ~~Using this methodology, the base number of units allowed at the project site would be 73.46 (rounded up to 74 per density bonus). The project proposes to provide four of the units (5%) as affordable to very low income households and pay the remaining 5% of the City's 10% Inclusionary Housing Obligation through the in-lieu fee alternative (Chapter 14c of the City's Code of Ordinances). Per the state Density Bonus Law, affordable unit percentage is calculated excluding units added by a density bonus (5% × 74 (base allowable) = 3.7 units; rounds up to 4 units). Under the Density Bonus Law, the provision of 5% very low income units allows the applicant to receive a density bonus of up to 20%, allowing additional market rate units to be constructed (74 base allowable units × 0.20 (density bonus) = 14.8 units), which rounds up to 15 density bonus units. Finally, to calculate the total dwelling units, the base allowable units are added to the density bonus units (74 base allowable units + 15 density bonus units = 89 total units allowed). Although 89 total units would be allowed under the density bonus, the project proposes only 83 total units. The maximum potential density (units per acre) with the density bonus would be determined by dividing the total units (83 units) by the net site acreage (12.45 acres). Using this methodology, the maximum potential density would be 6.67 units per acre under the provisions of the density bonus Law. The project proposes a total of 83 single family residences, 4 of which would be at the affordable/low income level (5% of the total), and the remaining 79 units would be designated as market rate. Affordable units will be proportional to the overall project in unit size, be dispersed throughout the project, and have access to all amenities available to market rate~~

[1] Although the proposed project would only develop 9.86 acres of the overall 16.78-acre site, 12.45 developable acres is used in the ~~density bonus calculation for the site~~ net site acreage calculation because buffer/setback areas required from the edge of the riparian areas do not get subtracted from the developable area acreage ~~for the density bonus calculation~~. The ~~density bonus~~ calculation used for the ~~proposed project is~~ net acreage could be (Total Site Area – Riparian Areas – Public Road Easements) (16.78 acres – 3.77acres – 0.569 acres) = 12.45 Developable Acres. ~~The riparian acreage used in this calculation includes southern arroyo willow riparian forest, non-native riparian, and non-vegetated channel, as outlined in Section 4.3 of this EIR.~~

~~units. The proposed dwelling unit distribution complies with the City of Oceanside Inclusionary Housing Ordinance requirements and the provisions of the Density Bonus Law regarding affordable housing.~~

~~The 12.45 developable acres used in the density bonus calculation uses the 3.77 acres of riparian area that includes non-native riparian habitat. The 3.19 acres of riparian area identified in the Biological Resources Technical Report prepared for the project (Appendix C) excludes non native riparian habitat and disturbed riparian forest. Including non native riparian habitat in the riparian area for the density bonus calculation is more conservative because the non-native riparian habitat is adjacent to the southern arroyo willow riparian forest. The Biological Resources Technical Report uses contiguous California Department of Fish and Wildlife area.~~

The project would take advantage of State of California's Density Bonus Law (Government Code Section 65915-65918; DBL) to develop 83 units. The State Density Bonus Law (DBL) was established to promote the construction of affordable housing units and allows projects to exceed the maximum designated density and to use development standard waivers, reductions, or incentives and concessions in exchange for providing affordable housing units in compliance with all current density bonus regulations. The City implements these State requirements. Dwelling unit distribution and density bonus calculations for the proposed project under DBL are outlined below.

Under the DBL, the "base" number of units permitted for a qualifying project is determined by multiplying the *gross* site acreage (16.78 acres[2]) by the maximum allowed density in either the zoning ordinance or land use element of the General Plan. In this case, the SFR-D designation allows a maximum up to 5.9 units per acre, resulting in a base density of 99.02 units, which rounds up to 100 per DBL (16.78 x 5.9 = 99.02).

The project proposed to deed restrict 5% of the total units for very-low-income housing, qualifying it for DBL benefits, including a favorable base unit calculation, a density bonus on top of this base calculation, one incentive, and waivers of development standards under DBL. However, the project is only seeking to utilize DBL's favorable base density calculation and to waive development standards that would otherwise limit or preclude project construction of the proposed 83 units with the planned amenities.[3]

Thus, of the 83 total units, four (5%) would be deed-restricted for very-low-income households. The project is subject to the City's Inclusionary Housing obligation percentage (10%) in place at the time the project's SB 330 application was filed in June 2022 per Chapter 14C, Inclusionary Housing, of the City's Code of Ordinances. To meet the remaining 5% of the City's 10% inclusionary housing requirement, the project would pay an in-lieu fee per Chapter 14c of the City's Code of Ordinances. The remaining 79 units would be designated as market rate. Affordable units will be proportional in size to market-rate units, evenly distributed throughout the project, and have access to all community amenities. The proposed unit distribution complies with the City of Oceanside Inclusionary Housing Ordinance and affordable housing provisions of the DBL.

Page 3-5, 3.2.3.1 Vehicular Circulation and Access

Both entrances to the project site are located at the project frontage along Guajome Lake Road. The proposed single-family development would be connected by a private loop road within the project site. Guajome Lake Road would be improved over the length of the property frontage, connecting to Albright Street. Road improvements would include 40-foot curb to curb improvements, including a ~~5.55~~-foot-wide parkway and a ~~4.55~~-foot-wide sidewalk. Additionally, as a condition of approval, the project would be required to incorporate traffic calming measures, such as speed

2 Gov. Code, § 65915, subd. (f), (o)(6); California Department of Housing and Community Development. "482 & 484 Beck Street – Letter of Technical Assistance." December 15, 2022, page 2. Available at 482 & 484 Beck Street – Letter of Technical Assistance

3 In other words, the project could develop 120 units, but is proposing to develop only 83 in keeping with the City's single-family residential standards.

cushions/tables and advisory signage, on Guajome Lake Road along the project frontage and/or in the vicinity of the project site. The design and location of such measures would be determined in coordination with City staff, subject to the satisfaction of the City Traffic Engineer The internal private road would be 28–32 feet wide with 5-foot-wide sidewalks. Circulation and emergency access drives have been designed in consultation with Oceanside Fire Department staff to provide 28-foot minimum widths, with designated truck turnarounds and key staging areas throughout the project site.

Page 3-7, Section 3.2.5 Project Design Features

3.2.5.3 Dust Control Strategies (SPAPCD Rule 55)

As stated in the Air Quality and Greenhouse Gas Emissions Technical Report (Appendix B), the project would include various construction dust control strategies and would be required to comply with SDAPCD Rule 55 to control dust emissions generated during the grading activities. These construction dust control strategies are specified in Appendix B Section 1.5. Compliance with these dust control measures would be identified on grading plan approvals.

- **PDF-AQ-1.** The following dust control measures shall be identified on grading plan approvals and implemented during grading activities:

    1. Active construction areas on site shall be watered at least two times daily.
    2. Speeds on unpaved roads shall be reduced to less than 15 miles per hour.
    3. All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour.
    4. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/or washed at the end of each workday.
    5. All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/or a minimum 2 feet of freeboard shall be maintained.

3.2.5.4 Fire Protection Plan Project Design Features

The Fire Protection Plan Letter Report (Appendix O of the Draft EIR) includes required measures pursuant to the CBC and the current Fire code standards to demonstrate the project would be in compliance with applicable portions of the City of Oceanside Municipal Code (Chapter 11, Fire Protection) and Oceanside Fire Department (OFD) Form 5205-17, Fire Master Plans for Commercial and Residential Development., as well as the 2019 California Building Code, Chapter 7A (or current edition at the time of construction); 2019 California Fire Code, Chapter 49 (or current edition at the time of construction); and 2019 California Residential Code, Section 337, as adopted by the City of Oceanside and the OFD. The proposed project would be required to comply with the measures specified in Appendix O Section 3, of the EIR; these requirements address water supply, fire access roads, gates, premises identification, fire hydrants, fire response, building construction, fire protection systems, smoke alarm systems, defensible space, roadway fuel modification zones, undesirable plants, and fuel modification areas vegetation management, environmental sensitive areas/riparian areas, and anticipated fire behaviors to meet operational needs. In addition, the proposed project would also comply with the code-exceeding measures specified in Appendix O, Section 4.1 of the EIR. These requirements address City and State fire and building code required measures for building in wildland urban interface areas and code exceeding measures and measures for nonconforming lots unable to achieve a full 100 feet of fuel modification or are located adjacent to the naturally vegetated coastal sage scrub habitat in the northern portion of the property. Further, each of the proposed buildings would comply with the enhanced ignition-

resistant construction standards of Chapter 7A of the latest edition of the CBC; these measures are specified in Appendix O Section 4.1, of the EIR. In summary, these requirements address roofs, eaves, exterior walls, vents, appendages, windows, and doors and result in hardened structures that have been proven to perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires. The following Project Design Features (PDFs) are proposed in order to exceed the requirements of Chapter 7A of the CBC and provide additional protection for the proposed project, including the structures most vulnerable, exterior side:

- **PDF-WF-1.** For residential structures facing the open space/naturally vegetated areas or located within reduced fuel modification zones in the northwestern portion of the development and along the western and eastern property boundaries, exterior glazing in windows (and sliding glass doors, garage doors, or decorative or leaded glass doors) shall be dual pane with both panes tempered glass.

- **PDF-WF-2.** Wildland exposed sides of the structures along the northern portion of the Project site shall include 5/8-inch Type X fire rated gypsum sheathing applied behind the exterior covering or cladding (stucco or exterior siding) on the exterior side of the framing, from the foundation to the roof for a facade facing the open space and naturally vegetated areas.

- **PDF-WF-3.** Annual FMZ Inspections: Yearly fuel modification maintenance shall be required by the Project's Homeowners Association (HOA) and each individual property owner. The community's HOA as well as individual property owners shall be responsible for obtaining an FMZ inspection and report from a qualified OFD-approved 3rd party inspector in May of each year certifying that vegetation management activities throughout the Project site and within each individual lot have been performed pursuant to the Project Fire Protection Plan (FPP) (Appendix O of EIR). The inspector will prepare a report for submittal to the OFD annually. All fuel modification area vegetation management shall occur on an annual basis no later than June 1 each year or more often as needed for fire safety, compliance with the FMZ requirements detailed in Appendix O, and as determined by the OFD. In compliance with the requirements detailed herein and OFD requirements, the HOA shall be responsible for all vegetation management within all common areas, including trees planted along driveways and interior roadways, and Zone 2 areas throughout the project site, including the perimeter of lots. The HOA shall be responsible for ensuring long-term funding and ongoing compliance with all provisions of the FPP. Each individual lot owner is responsible for ongoing Zone 1 maintenance requirements in their front and rear yards, extending from the structure to the rear property line or wall/fence. All homeowners will sign acknowledgement of maintenance requirements, and the HOA will include language in the CC&R's outlining these restrictions.

  The OFD will conduct annual inspections within the community to determine FMZ and defensible space compliance. If the FMZs are not compliant, the HOA and/or individual lot owners will receive a notice of violation and have a specified period of time to correct any noted issues so that a re-inspection can occur and certification can be achieved. Annual inspection fees are subject to the current Fire Department Fee schedule.

3.2.5.5 Biological Resources Project Design Features

The following are project design features related to biological resources:

- **PDF-BIO-1. Fencing.** The north portion of the site's existing topographical constraints, including steep slopes, would serve as a natural deterrent to resident access and recreational use within the on-site open space areas. Regardless, the project design includes a wall along the northern development perimeter where the slope will be constructed. Fencing will be placed around the remaining interface between development and open space to deter residents from recreating in the avoidance areas. The HOA shall be responsible for removing trash and prohibiting trespassing in the fenced open space area in the northern portion of the project site.

- **PDF-BIO-2. HOA Education.** The HOA shall establish an education program for homeowners regarding responsible pet ownership. The program shall encourage a) keeping pets and pet food indoors, especially at night; b) having pets neutered or spayed to reduce unwanted reproduction and long-range wandering; c) belling of cats to reduce their effectiveness as predators; and d) prohibiting release of unwanted pets into the wild.

3.2.5.6 Construction Compliance

The following project design feature is related to avoiding adverse effects and minimizing nuisances to nearby land uses during project construction activities:

- **PDF-CON-1. Construction Compliance.** The construction contractor shall designate a compliance and community relations officer. The name and contact information for the compliance and community relations officer shall be included on grading and improvement plans. The construction contractor shall post a sign along Guajome Lake Road providing:

    - The telephone number of the compliance and community relations officer.
    - The telephone number and name of a City of Oceanside staff member to contact regarding construction complaints.
    - The telephone number of the San Diego Air Pollution Control District.

    The compliance and community relations officer shall respond to any complaints and take corrective action within 48 hours, document complaints and concerns regarding on-site construction activity, and document the actions taken to address those concerns.

    The compliance and community relations officer shall also provide written notification of construction activities to all noise-sensitive receptors located within 500 feet of the project site. Notification shall include anticipated dates and hours during which construction activities are anticipated to occur and telephone number for the compliance and community relations officer. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) shall also be included in the notification.

Page 3-8, Section 3.3 Discretionary Actions and Approvals

A summary of the development standards and required waivers are outlined in Table 3.3-1, to demonstrate compliance with ~~mixed use~~ single-family residential development, or where density bonus waivers are requested. Development standards for ~~mixed use~~ single-family residential development are also described in detail in Chapter 4.10, Land Use, of this EIR.

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
Single-Family Residential District			
Lot Size (square feet)	6,000 square feet (minimum)	2,464–5,390 square feet	Waiver to accommodate affordable units and development at density proposed
Lot Width	65 feet (minimum)	32–54 feet	Waiver to accommodate affordable units and development at density proposed
Setback – Front	20 feet (minimum)	6–20 feet	Waiver to accommodate affordable units and development at density proposed
Setback – Side	7.5 feet (minimum)	3–7.5 feet	
Setback – Corner Side	10 feet (minimum)	6–10 feet	
Setback – Rear	15 feet (minimum)	5–15 feet	
Density	3.6–5.9 dwelling units/gross acre (44 units max)	83 units with density bonus (6.67 dwelling units/acre)	Waiver to accommodate development at density proposed
Lot Coverage	45% (maximum)	Coverage ranges from 20%–54%	Waiver to accommodate affordable units and development at density proposed
Lot Depth to Width Ratio	2.5:1	Various lots will exceed standard up to a ratio of 3.7:1	Waiver to accommodate affordable units and development at density proposed
Building Height	36 feet (maximum)	Approximately 25 feet	Complies with Code
Parking	One 2-car garage per single-family home	One two-car garage per single-family home; 32-foot-wide street sections allow for guest parking.	Complies with Code
Landscaping	Minimum 50% of yard-adjoining street shall be planting or landscaping (including ornamental gravel). The remainder may be used for driveways or walks.	Landscaped front yard areas would be provided for each lot.	Complies with Code
Useable Open Space	Total useable space shall be at least 300 square feet per dwelling unit.	Over 300 square feet/unit; variable per lot, but every lot proposes more than 300 square feet.	Complies with Code
Fences and Walls	Maximum height of a fence or wall, including retaining walls, shall be 6 feet. Retaining walls over 4 feet in height	Proposed retaining walls are not plantable/ irrigated, with wall	Waivers to accommodate affordable units and development at density proposed

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
	shall be planted and irrigated.	sections exceeding 6 feet in height: ▪ Exterior Facing – up to 9 feet ▪ Interior Facing – up to 12.1 feet ▪ Interior SW Basin – up to 10 feet	
Urban Forestry	Tree canopy minimum on sites 1 acre or more – 12% of site minimum. Permeable surface area minimum on sits 1 acre or more – 22% of site minimum.	Tree canopy would be a minimum of approximately 15.7%,or approximately 61,238 square feet. Permeable surface area would be a minimum of approximately 22.5%,or approximately 87,372square feet	Complies with Code Complies with Code
Renewable Energy Facilities	Residential projects with 25 or more units shall install and maintain renewable energy facilities that supply at least 50% of forecasted electricity demand.	Each home would be provided with a photovoltaic solar system to meet 50% of forecasted electricity demand.	Complies with Code
Equestrian Overlay District			
Equestrian Overlay District Residential Development Regulations	~~Article presents specific criteria and development regulations for the Equestrian Overlay District~~ Development projects shall be required to demonstrate that a minimum of eighty-five (85) percent of the total number of lots are in compliance with the development standards of the EQ Overlay District, unless the development project qualified for an exemption under Section 2802 B or C. The complying lots shall be shown on the	Project lots are not designed to meet equestrian development regulations, consistent with other residential subdivisions on Guajome Lake Road. The project would not provide equestrian facilities on site, but it would not impact the existing equestrian uses in the surrounding area.	Waiver to accommodate affordable units and development at density proposed

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
	tentative map and specifically designated on the final map.		
Minimum Horse Yard Area	Minimum horse yard area for the stabling and servicing of two (2) horses consisting of seventy-two hundred (7200) square feet of useable area. Useable area for horse yards shall be defined as an area with no slopes greater than 10 to 1. Residential projects shall demonstrate that the horse yard is able to site the following horse facilities exclusive of side and rear yard setbacks. Vehicular access (Section 2806 B.5) shall be allowed to utilize required setback areas. 1. A minimum of two (2) 24 foot by 24 foot pens. 2. A minimum area of 150 square feet for hay and tack storage. 3. A minimum area of 250 square feet for waste storage. 4. A minimum 50 foot diameter lunge (exercise) area. 5. Vehicular access for hay delivery and horse trailers.	2,464–5,390 square feet No equestrian facilities are proposed. Project lots are not designed to meet equestrian development regulations, consistent with other residential subdivisions on Guajome Lake Road.	Waiver to accommodate affordable units and development at density proposed
Usable Common Open Space (Minimum Horse Yard Area Alternative)	Minimum 2,500 square feet of common useable open space per unit for equestrian use or facilities as an alternative to providing a minimum horse yard area on each individual	Over 300 square feet/unit; variable per lot, but every lot proposes more than 300 square feet. No common useable open space for equestrian use or facilities are proposed.	Waiver to accommodate affordable units and development at density proposed

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
	lot as required in 2806(B)		
Equestrian Trails	All lots within a subdivision shall provide public equestrian trails a minimum of ten (10) feet in width, in accordance with the following standards: 1. Trails shall be designed in accordance with the City Engineering Design Manual. Trails shall be a minimum of eight (8") inches thick D.G. or turf acceptable by the City Engineer, a minimum of seven (7) feet in width, on both sides of all streets, with fencing on both sides of the horse trail. The remaining parkway shall be adjacent to the six-inch curb. All trails shall continue across driveways with three-quarter (3/4) inch crushed rock, 4 inches in depth or turf acceptable by the City Engineer. Rear trail access may be substituted for trails in front of the lots, where feasible, subject to the approval of the City Planner. 2. Fencing design details shall be depicted on landscape plans with the maximum height not to exceed forty-two (42") inches. Fencing shall be constructed of wood or other materials consistent in appearance to wood.	No equestrian trails are proposed. Project lots are not designed to meet equestrian trail standards, consistent with other residential subdivisions on Guajome Lake Road.	Waiver to accommodate affordable units and development at density proposed

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
	Materials shall be specified on the landscape plans, subject to the approval of the Planning Commission. A four (4') foot wide break in the fencing adjacent to a street shall be required for all lineal distances in excess of 150 feet and at all corners. 3. Maintenance of trails and fencing shall be performed by a homeowners' association or other acceptable means. 4. Warning signs shall be required on trails to warn trail users of hazardous conditions on the trail, and to warn motorists of locations where a trail crosses a roadway. Signing on trails/roadways shall be placed far enough in advance of the hazard that the trail user/motorist has time to slow down and maneuver		
Ratio of Lot Depth to Lot Width	Exceed 2.5:1	Various lots will exceed standard up to a ratio of 3.7:1	Complies with Code
Locational Requirements	No horse shall be stabled within forty (40) feet of any window or door of any on or off-site building used for human habitation. Additionally, all structures, including barns and stables, shall comply with the setback requirements of the base zoning district (see Single-Family Residential District	No equestrian facilities are proposed. Corrals are not proposed. Project lots are not designed to meet locational requirements of equestrian uses or facilities consistent with other residential subdivisions on Guajome Lake Road. The project would not provide equestrian facilities on site, but it would not impact the existing	Waiver to accommodate affordable units and development at density proposed

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
	development standards above). Corrals shall maintain a minimum side and rear yard setback of five (5) feet and a front yard setback of twenty-five (25) feet.	equestrian uses in the surrounding area. Setbacks: • Front: 6–20 feet • Side: 3–7.5 feet • Corner: 6–10 feet • Rear: 5–15 feet	
Siting of Residential Structures	A fully dimensioned site plan depicting all adjacent lots and existing structures is required of all proposed residential structures and additions demonstrating compliance with the locational requirements of the EQ Overlay District. Structures shall not be sited in such a way as to preclude a horse from being located on a lot	Project lots are not designed to meet locational requirements of equestrian uses or facilities consistent with other residential subdivisions on Guajome Lake Road. The project would not provide equestrian facilities on site, but it would not impact the existing equestrian uses in the surrounding area.	Waiver to accommodate affordable units and development at density proposed
Architectural Compatibility	Primary exterior material shall be brick, stone, exterior cement (stucco), concrete or wood, and all exterior building finishes shall be painted in colors that are compatible with the surrounding structures and landscape. Architectural styles should be reflective of the country and rural atmosphere of the area and surrounding development.	The project residences would be built in a variety of contemporary architectural design in one of three styles, referred to as “ranch,” “farmhouse,” and “progressive prairie.” The homes would be predominantly stucco, with either shingle, board and batten, or lap siding accents. Primary proposed building material finishes would include white, grey, or beige stucco exterior walls. Amenities and materiality are influenced by the equestrian nature of the surroundings and local points of interest, creating a natural and rustic landscape for the residents. The design of the community would feature a dynamic core	Complies with Code

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
		within the community providing flexible spaces for gathering, culinary experiences, play, walking, and recreation (Figure 3-4, Conceptual Open Space Plan).	
Buffer Requirement	Minimum buffer of thirty (30) feet, exclusive of rear or side yard setback, in the form of a trail, street, or open space easement where the project abuts nonequestrian, residential properties.	Project lots are not designed to meet the buffer requirements of an equestrian residential property. The project proposes non equestrian residential properties. The project would not provide equestrian facilities on site, but it would not impact the existing equestrian uses in the surrounding area.	Waiver to accommodate affordable units and development at density proposed
Scenic Park Overlay District			
General	Subjective compatibility criteria regarding topography, vegetation, and colors of the natural environment and the established physical scale and character of the area and not materially degrading the visual resources of the site or adjacent public parks.	The project would be built in a variety of contemporary architectural designs in one of three styles, referred to as “ranch,” “farmhouse,” and “progressive prairie.” The architectural styles would be reinforced through massing and materials. A variety of roof forms would be included to shape the massing, ranging from all gable, a combination of hip and gable, and all hip. Style-specific window grids and window and door trim, along with front door and garage door styles, would help reinforce the architectural character. The homes would be predominantly stucco, with either shingle, board and batten, or lap siding accents. Primary proposed building material finishes	Complies with Code

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
		would include white, grey, or beige stucco exterior walls. Enhanced elevations would be included based on the elevation exposure to public edges. The proposed home plans each have 3 elevation styles, with each style having 3 distinct color schemes, resulting in 27 possible combinations. All outdoor lighting would meet Chapter 39 of the City Municipal Code (light pollution regulations) and would be shielded appropriately. Street lighting featured throughout the site would be appropriately shielded to reduce lighting impacts to the surrounding open space areas and improve dark-sky regulation compliance. Additionally, the proposed development would be set back from Guajome Lake Road and adjacent residences to provide privacy and visual relief. Furthermore, proposed landscaping is designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. Retaining walls would be located along the project frontage, entries, and best management practice areas to support the required grading and storm drainage for the project site. A variety of vegetation would be featured along the	

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
		boundaries of the project site. Drought-tolerant plants would be utilized as aesthetic and functional requirements for the site. Landscaping would also be featured adjacent to public rights-of-way. Building heights would be limited to 25 feet. Further, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses. Final site plans and landscape plans would be subject to review and approval by the City, further ensuring compatibility. See below development standards.	
Grading Limitations	Alterations of existing natural or artificial contours of land shall be minimized; no major ridge line shall be altered; and any contour altered by grading shall be covered by topsoil and planted with native or drought resistant plant materials compatible with the adjacent landscape	All homes would be developed on the southern portion of the project site, which has been previously disturbed and graded. The project would avoid the northernmost portion of the project site along the riparian corridor, preserving approximately 6.92 acres of the 16.78-acre project site as open space. Landscaping is designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. Retaining walls would be located along the project frontage, entries, and best	Complies with Code

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
		management practice areas to support the required grading and storm drainage for the project site. A variety of vegetation would be featured along the boundaries of the project site. Drought-tolerant plants would be utilized as aesthetic and functional requirements for the site. Landscaping would also be featured adjacent to public rights-of-way.	
View Preservation	Subjective compatibility criteria regarding structures orientation to preserve views of the Guajome Regional Park and other public parks. The City Planner may modify this standard to protect sensitive biological resources, critical habitat, or wildlife corridors.	The proposed development would be set back from Guajome Lake Road and adjacent residences to provide privacy and visual relief. Due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses. Furthermore, proposed landscaping is designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. A variety of vegetation deriving influence from Guajome Regional Park would be featured along the boundaries of the project site.	Complies with Code
Building Height	Maximum building height shall not exceed 25 feet within 100 feet	25 feet	Complies with Code

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
	of the boundaries of Guajome Regional Park and other public parks		
Building Materials and Finishes	Primary exterior materials shall be brick, stone, exterior cement plaster (stucco), concrete or wood, and all exterior building finishes shall be painted in earth tones or other colors that are compatible with the surrounding landscape, unless the walls are textured, in which case no paint shall be required, or the City Planner finds that the type of finish is in reasonable architectural harmony with the area. Subjective compatibility criteria regarding roofing materials color and texture, as well as fencing along the boundary of the Guajome Regional Park, with regard to uniformity in texture, color, style, and materials to protect and enhance the viewshed of the park	The project residences would be built in a variety of contemporary architectural design in one of three styles, referred to as "ranch," "farmhouse," and "progressive prairie." The homes would be predominantly stucco, with either shingle, board and batten, or lap siding accents. Primary proposed building material finishes would include white, grey, or beige stucco exterior walls. Refer to explanation for the proposed project for "General" Development Standard above.	Complies with Code
Parking and Loading	On lots abutting a public park, no on-site (off-street) parking or loading spaces shall be exposed to view from the park.	The project would provide two-car garages for each single-family home, which would include a full driveway for additional parking. None of the proposed homes would face the park, thus the garages and driveways would not be visible from the park. Parking would be internal to the development. Parking lots are not proposed. Refer to	Complies with Code

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
		Figure 3-3, Conceptual Site Plan.	
Utilities	Underground utilities shall be provided unless the City Planner finds that underground installation would have a substantial adverse impact on the environment. Amateur and professional radio antennas, satellite antennas, and microwave transmitting and relay equipment shall be allowed in the Scenic Park Overlay District in accordance with Article 39 of the City's Zoning Ordinance.	Project utilities would be installed underground.	Complies with Code
Signs	All signs shall be subject to the applicable provisions of Article 33 and the following provisions: 1. No roof signs or painted wall signs shall be permitted. 2. The maximum height of pole signs shall not exceed 25 feet, measured from existing grade. 3. No off-site signs, including outdoor advertising signs, temporary leasing or for sale signs, or subdivision signs, shall be permitted except for multi-use directional signs on a free-standing pole or structure no more than 8 feet high with a maximum width of 4 feet for each panel. No pole or sign structure may have	Entry monumentation would utilize the proposed corner retaining wall. The proposed signage would create a gateway into the community. Additional signage is not currently proposed.	Complies with Code, Compliance with development standard to be verified at time of building permit issuance per standard COAs.

Table 3.3-1. Project Development Standards and Required Waivers

Development Standard	Regulation ~~Per Single Family Standards~~	Proposed Project	Notes
	more than four sign panels. 4. No temporary promotional signs or political signs shall be permitted.		

Page 3-11, Figure 3-1 Project Location (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 3-13, Figure 3-2 Existing Project Site (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 3-19, Figure 3-5a and 3-5b Conceptual Landscape Plan (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

3.3 Edits made to Section 4.2, Air Quality

Pages 4.2-20-21, Section 4.2.4 Impact Analysis

- ***b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

  Emissions from the construction phase of project components were estimated using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0.[4] Per preliminary project details, it is assumed that construction of the project would begin in summer 2023 and would last approximately 18 months.

  Table 4.2-6 provides assumptions regarding the construction timeline, potential phasing, construction equipment mix, and vehicle trips assumed for estimating project-generated construction emissions. The construction schedule has been developed based on available information provided by the project applicant, typical construction practices, and CalEEMod default assumptions. Construction phasing is intended to represent a schedule of anticipated activities for use in estimating potential project-generated construction emissions. Of note, construction activity associated with the off-site sewer force main is included within the building construction phase and the improvements to the approximately 1,200 linear foot segment of Guajome Lake Road is included in the paving phase.

[4] CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform to calculate construction and operational emissions from land use development projects. The model was developed for the California Air Pollution Control Officers Association in collaboration with multiple air districts across the state. Numerous lead agencies in the state, including SDAPCD, use CalEEMod to estimate greenhouse gas emissions in accordance with CEQA Guidelines Section 15064.4(a)(1).

Table 4.2-6. Construction Scenario Assumptions

Construction Phase (Duration)	Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Site Preparation	18	2	2,094 ~~0~~	Rubber-tired dozers	3	8
				Tractors/loaders/backhoes	4	8
Grading	20	6	6,281 ~~0~~	Excavators	1	8
				Graders	1	8
				Rubber-tired dozers	1	8
				Tractors/loaders/backhoes	3	8
Building Construction	136	50	0	Cranes	1	7
				Forklifts	3	8
				Generator sets	1	8
				Tractors/loaders/backhoes	3	7
				Welders	1	8
Paving	16	6	0	Pavers	2	8
				Paving equipment	2	8
				Rollers	2	8
Architectural Coating	28	6	0	Air compressors	1	6

Note: See Appendix B for additional details

Construction of the project would result in the temporary addition of pollutants to the local SDAB caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). The project would implement various dust control strategies as described in Chapter 3 of the EIR and would be required to comply with SDAPCD Rule 55 to control dust emissions generated during the grading activities (PDF-AQ-1). Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions and restricting vehicle speed on unpaved roads to 15 miles per hour. The project's construction emissions were estimated using CalEEMod and compared to the SDAPCD Thresholds of Significance. Implementation of PDF-AQ-1 (see Chapter 3 of Draft EIR) is assumed in CalEEMod.

Table 4.2-7. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Unmitigated

Construction Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2023	3.86 ~~3.38~~	62.31 ~~34.81~~	36.22 ~~28.62~~	0.19 ~~0.06~~	14.30 ~~10.30~~	7.01 ~~5.76~~
2024	244.36 ~~244.35~~	15.78	19.97	0.05	2.09	0.99
Maximum	**244.36** ~~244.35~~	**62.31** ~~34.81~~	**36.22** ~~28.62~~	**0.19** ~~0.06~~	**14.30** ~~10.30~~	**7.01** ~~5.76~~

Table 4.2-7. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Unmitigated

Construction Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	**Yes**	No	No	No	No	No

Source: Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

Table 4.2-8. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Mitigated

Construction Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2023	3.86 ~~3.38~~	63.32 ~~34.81~~	36.22 ~~28.62~~	0.19 ~~0.06~~	14.30 ~~10.30~~	7.01 ~~5.76~~
2024	66.26 ~~55.14~~	15.90 ~~15.78~~	19.97	0.05	2.09	0.99
Maximum	***66.26*** ~~***55.14***~~	***66.32*** ~~***34.81***~~	***36.22*** ~~***28.62***~~	***0.19*** ~~***0.06***~~	***14.30*** ~~***10.30***~~	***7.01*** ~~***5.76***~~
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	No	No	No	No	No	No

Source: Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

Page 4.2-27, Section 2.4.4 Impact Analysis

Table 4.2-9. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions – Unmitigated

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	134.22 ~~132.13~~	2.59 ~~2.28~~	165.61 ~~146.65~~	0.29 ~~0.03~~	22.29 ~~19.19~~	22.29 ~~19.19~~
Energy	0.07	0.60	0.26	<0.01	0.05	0.05
Mobile	2.35	2.54 ~~2.34~~	21.59 ~~21.04~~	0.05	38.81 ~~5.14~~	4.74 ~~1.39~~
Total	**163.65** ~~**134.56**~~	**5.73** ~~**5.22**~~	**187.45** ~~**167.94**~~	**0.34** ~~**0.28**~~	**61.14** ~~**24.38**~~	**27.07** ~~**19.28**~~
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	***Yes***	*No*	*No*	*No*	*No*	*No*

Source: Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District. <0.01 = reported value is less than 0.01.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

Table 4.2-10. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions – Mitigated

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	5.92 ~~5.76~~	0.08 ~~0.85~~	6.84 ~~7.25~~	0.00 ~~0.01~~	0.04 ~~0.10~~	0.04 ~~0.10~~
Energy	0.07	0.60	0.26	0.01	0.05	0.05
Mobile	2.35	2.51 ~~2.34~~	21.33 ~~21.04~~	0.05	38.34 ~~5.10~~	4.68 ~~1.39~~
Total	***8.32*** ~~***8.18***~~	***3.18*** ~~***3.79***~~	***28.43*** ~~***28.54***~~	***0.05*** ~~***0.06***~~	**38.43** ~~***5.29***~~	***4.77*** ~~***1.54***~~
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	*No*	*No*	*No*	*No*	*No*	*No*

Source: Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District. <0.01 = reported value is less than 0.01.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

3.4 Edits made to Section 4.3, Biological Resources

Pages 4.3-5-6, Section 4.3.1.2 Existing Biological Resources

Table 4.3-1. Vegetation Communities and Land Covers

Vegetation/Land Cover Type	On-Site Acreage	Off-Site Acreage	Total Acreage
Diegan coastal sage scrub	2.20	N/A	2.20
Non-native grassland	8.84	N/A	8.84
Disturbed habitat	0.45	0.12	0.57
Urban/developed	1.23	~~0.19~~0.52	~~1.42~~1.75
Southern arroyo willow riparian forest	2.87	N/A	2.87
Non-native riparian	0.58	N/A	0.58
Non-vegetated channel	0.32	N/A	0.32
Riparian forest (disturbed)	0.30	N/A	0.30
Total*	**16.78**	~~**0.31**~~**0.64**	~~**17.10**~~**17.43**

Urban/Development

Urban/developed refers to areas that have been constructed on or disturbed so severely that native vegetation is no longer supported. Within the project site, urban/developed refers to a home with associated structures and a yard with ornamental vegetation. Areas subject to offsite improvements, which include paving an approximately 200-foot-long section of Guajome Lake Road and construction a 3-inch sewer force main approximately 2,000 feet along Guajome Lake Road, are also located within the urban/developed land cover type.

Pages 4.3-18-19, Section 4.3.4 Impact Analysis

Table 4.3-4. Permanent Impacts to Vegetation Communities and Land Covers

Vegetation/Land Cover Type	Impacts (Acres)		Total Impacts (Acres)[a]	Mitigation		On-site Avoidance
	Development	Improvement of Guajome Lake Road and Sewer Force Main		Ratio[b]	Acres Required	
Diegan coastal sage scrub	1.25	N/A	1.25	2:1	2.5	0.95
Non-native grassland	8.29	N/A	8.29	0.5:1	4.14	0.55
Non-native riparian	N/A	N/A	N/A	N/A	N/A	0.58
Non-native channel	N/A	N/A	N/A	N/A	N/A	0.32
Riparian forest (disturbed)	N/A	N/A	N/A	N/A	N/A	0.30
Southern willow riparian forest	N/A	N/A	N/A	N/A	N/A	2.87
Urban/developed	0.69	~~0.19~~0.52	~~0.87~~1.20	N/A	0	0.55
Disturbed Habitat	0.09	0.12	0.21	N/A	0	0.36
Total[b]	**10.31**	**~~0.31~~0.64**	**~~10.62~~ 10.95**	**–**	**6.64**	**6.48**

Source: Appendix C, Biological Technical Resources.
Notes: N/A = not applicable.
[a] Acreages may not sum precisely due to rounding.
[b] Per Table 5-2, Mitigation Standards for Impacts to Natural Vegetation and Habitat, in the Subarea Plan (City of Oceanside 2010). Impacts to coastal sage scrub in the Coastal Zone and Agency approved areas of the Off-site Mitigation Zone shall be mitigated at a 2:1 ratio.

Of the approximately 16.78-acre project site and 0.64 acres of offsite improvement areas, the proposed project would result in direct permanent impacts to ~~10.31~~10.95 acres, of which ~~an additional 0.31~~ 0.64 acres is associated with off-site improvements to Guajome Lake Road and the off-site sewer line ~~(10.62 acres total)~~. Of the ~~10.62~~10.95 acres of impacts, 9.54 acres are to sensitive vegetation communities and include 1.25 acres of impacts to coastal sage scrub and 8.29 acres of impacts to non-native grassland. Off-site impacts are limited to developed and disturbed areas.

Special-Status Wildlife Species

The undeveloped riparian habitats within the project site have the potential to support least Bell's vireo and white-tailed kite. White-tailed kite was observed on site, and least Bell's vireo was observed foraging in off-site habitat. The coastal sage scrub habitat on site supports nesting coastal California gnatcatcher. The proposed project would not result in the direct loss of any riparian habitat that is known to support least Bell's vireo or white-tailed kite but would result in the permanent loss of 1.25 acres of habitat utilized by coastal California gnatcatcher and 8.29 acres of potential foraging habitat for white-tailed kite (**Impact BIO-2**). Direct impacts to this habitat would be ~~mitigation~~mitigated through implementation of **MM-BIO-1**, which would provide for the creation and preservation of high-value habitat at an ~~conservation bank~~existing preserve.

Pages 4.3-25 through 4.3-29, Section 4.3.5 Mitigation Measures

- MM-BIO-7 Biological Monitor Requirements and Duties. A qualified biologist shall be on site daily during initial clearing/grubbing and weekly during grading activities within 500 feet of preserved habitat to ensure compliance with all project-imposed mitigation measures. The biologist shall be available during pre-construction and construction phases to review grading plans, address protection of sensitive biological resources, monitor ongoing work, and maintain communications with the project's engineer to ensure that issues relating to coastal California gnatcatcher (*Polioptila californica californica*), least Bell's vireo (*Vireo bellii pusillus*), and their habitat are appropriately and lawfully managed.

The qualified biological monitor shall also be responsible for the following duties:

1. Oversee installation of and inspect temporary fencing and erosion control measures within or up-slope of avoided and/or preserved areas a minimum of once per week during installation and daily during all rain events until established to ensure that any breaks in the fence or erosion control measures are repaired immediately.
2. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.
3. Halt work, if necessary, and confer with the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and City of Oceanside (City) to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to USFWS, CDFW, and the City within 24 hours of its occurrence.
4. Submit weekly letter reports (including photographs of impact areas) via email to the City during clearing/grubbing of potential habitat and/or project construction resulting in ground disturbance within 500 feet of avoided potential habitat. The weekly reports shall document that authorized impacts were not exceeded and general compliance with all conditions. The reports shall also outline the duration of monitoring, the location of construction activities, the type of construction that occurred, and equipment used. These reports shall specify numbers and locations of any coastal California gnatcatchers/least Bell's vireo and nests, sex, observed behavior (especially in relation to construction activities), and remedial measures employed to avoid, minimize, and mitigate impacts to coastal California gnatcatchers/least Bell's vireo and nests.
5. Submit a final report to the City within 60 days of project completion that includes the following: (1) as-built construction drawings for grading with an overlay of any active nests; (2)photographs of habitat areas during pre-construction and post-construction conditions; and (3) other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with the avoidance/minimization provisions and monitoring program as required by USFWS and CDFW were achieved.

MM-BIO-8 Breeding Season Avoidance**.** The removal of vegetation from the project impact footprint shall occur only during September 1 through February 14 to avoid the bird breeding season. Further, to the maximum extent practicable, grading activities associated with construction of the project shall occur September 1 through February 14 to avoid the breeding season. If project construction must occur during the breeding season, ~~MM-BIO-8 and~~ MM-BIO-9 shall be implemented.

MM-BIO-9 ~~General~~ Pre-construction Surveys**.** ~~Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season.~~

General Pre-construction Survey. Within 72 hours of Project related activities, a qualified biologist with the appropriate handling permits shall conduct a survey to determine the presence of potential rare, listed, or other special status wildlife species. The qualified biologist shall survey the proposed impact areas and a 50-foot buffer. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, or in loose soil. Should a special-status species be located in the Project site during pre-activity surveys all individuals shall be documented and locations of presence recorded. If a special-status species is found, the qualified biologist shall contact the Wildlife Agencies, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall obtain all appropriate permits and prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The list (or plan) of protocols shall be implemented during Project construction and activities/biological construction monitoring.

Nesting Bird Survey. To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat will occur outside of the breeding season (February 15 to August 31). Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a City of Oceanside (City)-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 300 feet of the construction area, and federally- or State-listed birds and raptors on or within 500 feet of the construction area. The pre-construction survey must be conducted within ~~10~~3 calendar days prior to the start of construction, the results of which must be submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected by the City-approved biologist, the following buffers shall be established: (1) no work within 300 feet of a non-listed nesting migratory bird nest, and (2) no work within 500 feet of a listed bird or raptor nest. However, the City may reduce these buffer widths depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant will contact the City and Wildlife Agencies to determine the appropriate buffer.

~~Coastal California Gnatcatcher Survey. A biologist holding a Section 10(a)(1)(A) permit shall perform a minimum of three focused surveys, on separate days, to determine the presence of coastal California gnatcatcher (*Polioptila californica californica*) nests within 500 feet of Project grading activities if construction is proposed during the coastal California gnatcatcher breeding season. The surveys shall begin a maximum of 7 days prior to Project construction (including temporary fence installation required by MM-BIO-3), and one survey shall be conducted the day immediately prior to the initiation of work. Additional surveys shall be done once a week during Project grading activities during the breeding season.~~

Crotch's Bumble Bee Pre-Construction Survey. A pre-construction survey for Crotch's bumble bee shall be conducted within the construction footprint prior to the start of ground-disturbing construction activities occurring during the Crotch's bumble bee nesting period (February 1 through October 31). The survey shall ensure that no nests for Crotch's bumble bee are located within the construction area. The pre-construction survey shall include a habitat assessment and focused surveys, both of which shall be based on recommendations described in the Survey Considerations for California Endangered Species Act (CESA)

Candidate Bumble Bee Species, released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current version at the time of construction.

The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat on site, including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and human-made structures that may support bumble bee colonies such as rock walls, rubble, and furniture. The habitat assessment shall be repeated prior to February 1 in each year ground-disturbing activities occur to determine if nesting resources are present within the on-site and/or off-site impact areas. If nesting resources are present in the on-site and/or off-site impact areas, focused surveys shall be conducted.

The focused survey shall be performed by a biologist with expertise in surveying for bumble bees and include at least three survey passes that are not on sequential days or in the same week, preferably spaced 2 to 4 weeks apart. The timing of these surveys shall coincide with the colony active period (April 1 through August 31 for Crotch's bumble bee). Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling), and surveyors shall wait at least 1 hour following rain. Optimal surveys are when there are sunny to partly sunny skies and a temperature greater than 60°F. Surveys may be conducted earlier if other bees or butterflies are flying. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 miles per hour). Within non-developed habitats, the biologist shall look for nest resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the biologist shall watch the nest resources for up to 5 minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after 5 minutes of observation. If a bumble bee worker is detected, then a representative shall be identified to species. Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them, depending on their proximity to one another. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point to determine which would provide 100% visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes).

Identification shall include trained biologists netting/capturing the representative bumble bee in appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees. The bee shall be placed in a clear container for observation and photographic documentation, if able. The bee shall be photographed using a macro lens from various angles to ensure recordation of key identifying characteristics. If bumble bee-identifying characteristics cannot be adequately captured in the container due to movement, the container shall be placed in a cooler with ice until the bumble bee becomes inactive (generally within 15 minutes). Once inert, the bumble bee shall be removed from the container and placed on a white sheet of paper or card for examination and photographic documentation. The bumble bee shall be released into the same area from which it was captured upon completion of identification. Based on implementation of this method on a variety of other bumble bee species, they become active shortly after removal from the cold environment, so photography must be performed quickly.

If Crotch's bumble bee nests are not detected, no further mitigation would be required. The mere presence of foraging Crotch's bumble bees would not require implementation of additional minimization measures

because they can forage up to 10 kilometers from their nests. If nest resources occupied by Crotch's bumble bee are detected within the construction area, no construction activities shall occur within 100 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources shall be avoided for the duration of the Crotch's bumble bee nesting period (February 1 through October 31). Outside of the nesting season, it is assumed that no live individuals would be present within the nest because the daughter queens (gynes) usually leave by September, and all other individuals (original queen, workers, males) die. The gyne is highly mobile and can independently disperse to outside of the construction footprint to surrounding open space areas that support suitable hibernacula resources.

A written survey report shall be submitted to the City of Oceanside and CDFW within 30 days of the pre-construction survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. If Crotch's bumble bee nests are observed, the survey report shall also include recommendations for avoidance, and the location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report.

If Crotch's bumble bee is detected within the project site, the project applicant shall consult with CDFW regarding the need to obtain an Incidental Take Permit. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch's bumble bee may supersede measures provided in this document and shall be incorporated into the habitat mitigation and monitoring plan. In the event that an Incidental Take Permit is needed, mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process.

3.5 _Edits made to Section 4.4, Cultural Resources

Page 4.4-1, Section 4.4.1 Existing Conditions

The approximately 16.78-acre project site is currently a disturbed, partially vacant property with an existing residence. The cultural study area (or area of potential effect [APE]) includes the entire project site and areas of off-site improvements, which include paving Guajome Lake Road between the project frontage and Albright Street, approximately 1,200 linear feet, and installation of up to 2,000 linear feet of 3-inch sewer force main within Guajome Lake Road. Much of the project site appears to have been previously disturbed. The project site has been previously impacted by grading and land development on adjacent parcels. The project site shows signs of disturbances related to previous grading, ~~recent Sprinter construction staging,~~ evidence of illegal dumping, and evidence of moving activities. There is an existing residence located just south of the creek on site. Vegetation within APE site includes primarily non-native grasslands and disturbed areas. All of the land that would be affected by offsite improvements is disturbed or developed. Ornamental plantings occur along the southeastern edge of the site, bordering an existing residential development, and small isolated patches of coastal sage scrub exist in the western and northwestern portions of the project APE.

Page 4.4-9, Section 4.4.2 Regulatory Setting

Assembly Bill 52

California AB 52, which took effect July 1, 2015, establishes a consultation process between California Native American tribes and lead agencies in order to address tribal concerns regarding project impacts and mitigation to Tribal Cultural Resources (TCRs). Public Resources Code Section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, and object with cultural value to a California Native American tribe that is either:

1. Listed or eligible for listing in the CRHR or a local register of historical resources, or
2. Determined by a lead agency to be a TCR.

In compliance with AB 52, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities. The City provided formal notification on September 28, 2022. to California Native American tribal representatives identified by the California NAHC. The City received consultation requests from the Rincon Band and San Luis Rey Band as described below. The City did not receive any follow-up requests for consultation from other California Native American tribal representatives.

An AB 52 consultation request was received by the Rincon Band on October 18, 2022. The Rincon Band voiced concerns that the project may impact tangible TCRs, Traditional Cultural Landscapes, and potential Traditional Cultural Properties. The City provided project information and the cultural resources report at the request of Rincon. Consultation was conducted with Cheryl Madrigal, Tribal Historic Preservation Officer, on March 16, 2023. The City did not receive any follow-up requests for further consultation from the Rincon Band.

An AB 52 consultation was conducted with Cami Mojado, Cultural Resource Management Specialist, from the San Luis Rey Band on June 22, 2023. The San Luis Rey Band voiced concerns about the number of artifacts in the vicinity and the project site having a strong likelihood of discovery. The San Luis Rey Band representative requested to see the proposed mitigation and intends to conduct additional research of documentation for other recent projects in the area. The City provided requested project information to the San Luis Rey Band representative on June 27, 2023. The City did not receive any follow-up requests for further consultation from the San Luis Rey Band.

Page 4.4-15, Section 4.4.5, Mitigation Measures

MM CUL-6 The Qualified Archaeologist or the Luiseño Native American Monitor may halt ground disturbing activities if unknown Tribal Cultural Resources, or non-Tribal unique archaeological resources as defined in CEQA Guidelines section 15064.5 (artifact deposits or cultural features or artifacts) are discovered. Ground disturbing activities shall be directed away from these deposits to allow a determination of potential importance. Isolates and clearly non-significant deposits ~~will~~ shall be minimally documented in the field, and before grading proceeds these items shall be secured until they can be repatriated. If items cannot be securely stored on the project site, they may be stored in off-site facilities located in San Diego County. If the Qualified Archaeologist and Luiseño Native American monitor determine that the unearthed tribal cultural resource, or non-Tribal unique archaeological resources (artifact deposits, or cultural features or artifacts) are considered potentially significant TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the respectful and dignified treatment of those resources. The avoidance and protection of the significant tribal cultural

resource and/or unique archaeological resource is the preferable mitigation. If, however, it is determined by the City that avoidance of the resource is infeasible, and it is determined that a data recovery plan is necessary by the City as the lead agency under CEQA, TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the drafting and finalization of any such recovery plan. For significant Tribal Cultural Resources, or non-Tribal unique archaeological resources (artifact deposits, or cultural features or artifacts) artifact deposits or cultural features that are part of a data recovery plan, an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods. The data recovery plan shall also incorporate and reflect the tribal values of the TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project. If the Qualified Archaeologist collects such resources, the Luiseño Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the Tribal Cultural Resources that are unearthed during the ground disturbing activities, the Luiseño Native American monitor, may at their discretion, collect said resources and provide them to the appropriate TCA Luiseño Tribe, as determined through the appropriate process, for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Ground disturbing activities shall not resume until the Qualified Archaeologist, in consultation with the Luiseño Native American Monitor, deems the cultural resource or feature has been appropriately documented and/or protected. Non-Tribal unique archaeological resource materials shall be collected and stored by the Qualified Archaeologist in offsite facilities located in San Diego County until the non-Tribal unique archaeological resources are curated at an appropriate qualified repository in San Diego County that meets federal standards per 36 CRF Part 79.

3.6 Edits made to Section 4.5, Energy

Pages 4.5-8-9, Section 4.5.4 Impact Analysis

Heavy-duty construction equipment of various types would be used during each phase of construction. The CalEEMod analysis discussed in Appendix B to this EIR includes the proposed construction schedule and assumed equipment usage. Based on that analysis, over all phases of construction, diesel-fueled construction equipment would run for an estimated 23,680 hours, as summarized in Table 4.5-1. Of note, equipment usage for construction of the off-site sewer force main is included within the building construction phase and the paving of 1,200 linear feet of Guajome Lake Road is included in the paving phase.

Page 4.5-10, Section 4.5.4 Impact Analysis

Table 4.5-4. Construction ~~Vendor~~ Truck Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	kg/CO_2/gallon	Gallons
Site preparation	2,214.00 ~~120.00~~	63,44 ~~0.60~~	10.21	6,213.52 ~~58.77~~
Grading	6,618.00 ~~336.00~~	190.32 ~~1.81~~	10.21	18,640.12 ~~177.28~~
Building construction	9,100.00	148.83	10.21	14,576.89
Paving	528.00	1.18	10.21	115.57
Architectural coatings	474.00	0.00	10.21	0.00
			Total	**24,617.59** **~~14,928.50~~**

Sources: Appendix B (construction worker CO_2); The Climate Registry 2019 (kg/CO_2/gallon).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

As shown in Tables 4.5-2 through 4.5-4, the project is estimated to consume a total of approximately 100,789.72 ~~76,172.13~~ gallons of petroleum during the construction phase. By comparison, approximately 14.8 billion gallons of petroleum would be consumed in California over the course of the proposed project's construction period, based on the California daily petroleum consumption estimate of approximately 52.9 million gallons per day (CEC 2016). Additionally, the proposed project would be required to comply with CARB's Airborne Toxics Control Measure, which limits fuel use by restricting heavy-duty diesel vehicle idling time to 5 minutes. Based on the calculations above, the project would not significantly affect the overall demand for petroleum, considering the project's minimal contribution toward demand and its compliance with CARB's Airborne Toxics Control Measure.

3.7 Edits made to Section 4.6, Geology and Soils

Page 4.6-4, Section 4.6.1.3 Paleoenvironment

The San Diego Natural History Museum records search results letter was received on May 09, 2022. No records of fossil localities were found within the boundaries of the project site or areas proposed to support off-site improvements; however, the museum reported four fossil localities in a 1-mile radius of the project vicinity (Appendix F).

Page 4.6-10, Section 4.6.4 Impact Analysis

As described in Appendix F, no paleontological resources were identified within the project site or areas proposed to support off-site improvements as a result of the institutional records search, desktop geological review, and paleontological survey. During the survey, Eocene siltstone rocks and debris from road improvements were observed and documented. The paleontological records search conducted by the San Diego Natural History Museum revealed four nearby fossil localities; however, none were found within the boundaries of the project site or areas proposed to support off-site improvements. All four localities are from the Bay Point Formation, which crops out nearby but is not anticipated to be impacted by implementation of the project because it is not mapped within or near the project site (Appendix F). Eocene deposits mapped within and throughout most of the project site have high paleontological sensitivity; Holocene alluvial deposits have low paleontological sensitivity on the surface, increasing with depth; and artificial fill, if present, has no paleontological sensitivity. Based on the survey and records search results, map, and literature review, the project site has high potential to produce paleontological resources during planned construction activities in areas underlain by Eocene deposits and Holocene deposits at depth. In the event that intact paleontological resources are discovered on the project site, ground-disturbing activities associated with construction of the project, such as grading and augering during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact (**Impact GEO-1**). However, with implementation of proposed mitigation measure (**MM)-GEO-1**, potential impacts would be reduced to less than significant. Therefore, impacts to paleontological resources are determined to be **less than significant with mitigation incorporated**.

3.8 Edits made to Section 4.7, Greenhouse Gases

Page 4.7-22, Section 4.7.4 Impact Analysis

Construction of the project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The construction GHG emissions as calculated in CalEEMod are shown in Table 4.7-3 below. Of note, equipment usage for construction of the off-site sewer force main is included within the building construction phase. Per preliminary project details, analysis assumed construction of the project would begin in summer 2023 and would last approximately 18 months. GHGs related to construction are shown in Table 4.7-3.

3.9 Edits made to Section 4.8, Hazards and Hazardous Materials

Page 4.8-2, Section 4.8.1 Existing Conditions

Historic Property Uses

As described in the Phase 1 ESA prepared for the project site (Appendix P), no recognized environmental conditions (RECs) were identified. In addition, historical resources related to the adjoining properties and properties in the vicinity of the project site do not represent RECs that are of direct environmental concern to the project site. As stated above, portions of the project site have been previously used for residential purposes that include a septic waste disposal system. Based on the regulatory and historical research completed during the preparation of the Phase I ESA, no information has been revealed regarding the potential for a previous accidental spill or release of pesticide products at the project site. In addition, prior soil sampling and analysis activities completed at the project site did not reveal detections of agricultural chemicals or other contaminants of concern at concentrations above residential human health

Page 4.8-5 through 4.8-6, Section 4.8.2 Regulatory Setting

State

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and to notify workers of exposure (8 CCR 330 et seq.). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

Cal/OSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations 8 CCR 1529. Only a Cal/OSHA-Certified Asbestos Consultant can provide asbestos consulting (as defined by the Business and Professions Code, 7180–7189.7 and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement

project design, contract administration, supervision of site surveillance technicians, sample collection preparation of asbestos management plans, and clearance air monitoring.

Asbestos and Air Quality Hazardous Waste Control Act

Enforcement of the NESHAP Regulation, HSC Section 39658(b)(1)

The California Air Resources Board (CARB) is responsible for overseeing compliance with the federal asbestos NESHAPs in Los Angeles County. The asbestos NESHAP Program enforces compliance with the federal NESHAP regulation for asbestos and investigates all related complaints, as specified by HSC Section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these "non-delegated" districts, a demolition/renovation notification is required for compliance with the asbestos NESHAP. (This notification is not equivalent to a permit.) CARB reviews and investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and EPA to facilitate communication and enforcement continuity, and assists EPA in training district staff to enforce the asbestos NESHAP.

Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations include California Health & Safety Code Sections 17920.10, 17961, 17980, 105185 to 105197, 105250 to 105257, 105275 to 105310, 116875 to 116880, and 124125 to 124165; California Civil Code Sections 1102 to 1102.16, and 1941.1; California Education Code Sections 32240 to 32245; and California Labor Code Sections 6716 to 6717.

California Unified Program for Management of Hazardous Waste and Materials

California Health and Safety Code (HSC), Division 20, Chapter 6.11, Sections 25404- 25404.9 – Unified Hazardous Waste and Hazardous Materials Management Regulatory Program4Under the CalEPA, the DTSC and Enforcement and Emergency Response Program administer the technical implementation of California's Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC 2019). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California HSC made by SB 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program

- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan and Hazardous Material Inventory Statements
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the project site is the San Diego County Department of Environmental Health and Quality.

Page 4.8-10 through 4.8-11, Section 4.8.4 Impact Analysis

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction

Construction activities would entail routine transport of materials potentially hazardous to humans, wildlife, and sensitive environments. These materials include gasoline oil, solvents, cleaners, paint, and various other liquids and materials required for the operation of construction equipment. Direct impacts to human health and biological resources from transport, use, or disposal of these materials could occur as a result of project construction. In addition, the project would include demolition of the existing structure on the project site, which could potentially contain hazardous building materials such as asbestos-containing materials, lead-based paint, or polychlorinated biphenyl caulk. However, existing federal and state regulations and standards are in place for the safe removal, use, handling, storage, and transport of these materials and would be implemented during construction of the project. These regulations include the Federal Chemical Accident Prevention Provisions (Part 68 of the Code of Federal Regulations); California Highway Patrol and California Department of Transportation container and licensing requirements for transportation of hazardous waste on public roads; the IFC; the RCRA of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984; California's Hazardous Waste Control Law; the CFC; California Health and Safety Code Hazardous Materials Release Response Plans and Inventory; the California Integrated Waste Management Act; and regulations developed by Cal/OSHA., including all applicable regulations related to hazardous building materials that could be encountered during demolition activities (e.g. asbestos and lead-based paint).

Additionally, standard best management practices included in the stormwater pollution prevention plan required of the project by the Construction General Permit (see Chapter 4.9, Hydrology and Water Quality), and associated hazardous materials handling protocols would be prepared and implemented to ensure the safe storage, handling, transport, use, and disposal of all hazardous materials during the construction phase of the project. Therefore, potential impacts related to the routine transport, use, or disposal of hazardous materials during project construction are determined to be **less than significant**.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

Construction activities would entail transport, use, or disposal of potentially hazardous materials including, but not limited to, diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents,

lubricant oils, adhesives, human waste, and chemical toilets. Spill or upset of these materials could have the potential to significantly impact surrounding land uses; however, federal, state, and local controls have been enacted to reduce the effects of such potential hazardous materials spills. The San Diego County Department of Environmental Health & Quality, as the CUPA agency, ~~Oceanside Fire Department~~ enforces local ~~City~~, state, and federal hazardous materials regulations for the City, ~~City regulations.~~ including spill mitigation and the containment and securing of hazardous materials containers to prevent spills. Compliance with these requirements is mandatory under standard permitting conditions and would minimize the potential for the accidental release or upset of hazardous materials, thus ensuring public safety. Therefore, compliance with regulations and requirements such as Cal/OSHA requirements, the Hazardous Waste Control Act, CalARP program, and the California Health and Safety Code would ensure potential impacts related to the release of hazardous materials would be **less than significant**.

3.10 Edits made to Section 4.9, Hydrology and Water Quality

Page 4.9-1, Section 4.9.1 Existing Conditions

Overland runoff flows ~~from the northeast corner of the project site to the southwest toward an existing bike path and North County Transit District Sprinter line~~ toward Guajome Lake Road where runoff enters the existing storm drain system by culverts ~~and headwalls~~ south of ~~the bike path~~ the road and the remaining overland runoff flows east, draining into an existing ephemeral stream that drains to the northwest (Appendix H).

3.11 Edits made to Section 4.10, Land Use and Planning

Page 4.10-1, Section 4.10.1 Existing Conditions

The City of Vista municipal boundary is located approximately 0.5~~1~~ miles east of the project site.

Page 4.10-8, Section 4.10.4 Impact Analysis

a) Would the project physically divide an established community?

The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road that would impact mobility within an existing community or between a community and outlying area. As described above, the 16.78-acre project site is located in the Guajome Neighborhood Area of the east central portion of the City. The proposed project site is located Guajome Lake Road southeast of Albright Street. in the east-central portion of the City. The City of Vista Boundary is located approximately 0.5~~1~~ miles east of the project site. The project site is located approximately 0.5 miles south of SR 76 and approximately 3.4 miles north of SR 78. The existing land use designation and zoning allows single family residential development.

Pages 4.10-13 through 4.10-59

The following provides portions of Draft EIR Table 4.10-1 that have been updated in this Final EIR.

Table 4.10-1. City of Oceanside General Plan Consistency Evaluation

Policy Number	Policy Text	Consistency Analysis	Conformance/ Nonconformance
City of Oceanside General Plan			
Land Use Element			
1.121 Land Use Compatibility with Adjacent Jurisdictions or Responsible Agencies Objective	To assure appropriate land use compatibility is maintained between Oceanside and adjacent jurisdictions or responsible agencies.	The project site is located within the east-central portion of the City, in the Guajome Neighborhood Area. The City of Vista boundary is located approximately 0.5 ~~0.1~~ miles east of the project site. The Oceanside General Plan Land Use designation for the site is Single-Family Detached Residential (SFD-R). In addition, the project site is surrounded by residential and open space uses. The project would not impact any adjacent jurisdictions or responsible agencies.	The project would be in conformance with this objective.
Recreational Trails Element			
Goal 8	An interconnected network of pedestrian facilities within the City, linking recreational and other destinations.	Road improvements would include 40-foot curb to curb improvements including a ~~5.5~~5-foot-wide parkway and a ~~4.5~~5-foot-wide sidewalk. Pedestrian access within the site would be provided by 5-foot-wide sidewalks along the internal private loop. Sidewalks would also be constructed along the project frontage. Immediately adjacent to the project site is Guajome Regional Park, which includes multiple different trails. Santa Fe Trail is located approximately 0.22 miles east of the site off of Guajome Lake Road to the south.	The project would be in conformance with this goal.
Circulation Element			
Long Range Policy Direction			
Goal 1	A multimodal transportation system, which allows for the efficient and safe movement of all people and goods, and which meets current demands and future needs of the population and projected land uses with minimal impact to the environment.	Both entrances to the project site are located at the project frontage along Guajome Lake Road. The proposed single-family development would be connected by a private loop road within the project site. Guajome Lake Road would be improved the length of the property frontage, connecting to Albright Street. Road improvements would include 40-foot curb to curb	The project would be in conformance with this goal.

Table 4.10-1. City of Oceanside General Plan Consistency Evaluation

Policy Number	Policy Text	Consistency Analysis	Conformance/ Nonconformance
		improvements including a ~~5.5~~5-foot-wide parkway and a ~~4.5~~5-foot-wide sidewalk. The internal private road would be 28–32 feet wide with 5-foot-wide sidewalks. Circulation and emergency access drives have been designed in consultation with Oceanside Fire staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site.	
Policy 3.4	The City may permit construction of private streets within individual development projects, provided that: They are designed geometrically and structurally to meet City standards. Only project occupants are served. All emergency vehicle access requirements are satisfied. The streets do not provide direct through route between public streets. The Homeowners Association and/or property owners provide an acceptable program for financing regular street maintenance.	Both entrances to the project site are located at the project frontage along Guajome Lake Road. The proposed single-family development would be connected by a private loop road within the project site. Guajome Lake Road would be improved the length of the property frontage, connecting to Albright Street. Road improvements would include 40-foot curb to curb improvements including a ~~5.5~~5-foot-wide parkway and a ~~4.5~~5-foot-wide sidewalk. The internal private road would be 28–32 feet wide with 5-foot-wide sidewalks. Circulation and emergency access drives have been designed in consultation with Oceanside Fire staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site.	The project would be in conformance with this policy.
Policy 3.20	If the location and traffic generation of a proposed development will result in congestion on major streets or failure to meet the LOS [level of service] D threshold, or if it creates safety hazards, the proposed development shall be required to make necessary off-site improvements. Such improvements may be eligible for reimbursement from collected impact fees. In some cases, the development may	The project would not cause congestion on major streets. As related to transportation, the project would not create a safety hazard. Section 4.15, Traffic and Circulation, of the EIR concludes that project impacts related to traffic and circulation would be less than significant. Additionally, as described in the project description, the proposed single-family development would be connected by a private loop road within the project site. Guajome Lake Road	The project would be in conformance with this policy.

Table 4.10-1. City of Oceanside General Plan Consistency Evaluation

Policy Number	Policy Text	Consistency Analysis	Conformance/ Nonconformance
	have to wait until financing for required off-site improvements is available. In other cases where development would result in unavoidable impacts, the appropriate findings of overriding consideration will be required to allow temporary undesirable levels of service.	would be improved the length of the property frontage, connecting to Albright Street. Road improvements would include 40-foot curb to curb improvements including a ~~5.~~5-foot-wide parkway and a ~~4.~~5-foot-wide sidewalk. The internal private road would be 28–32 feet wide with 5-foot-wide sidewalks. Circulation and emergency access drives have been designed in consultation with Oceanside Fire staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site.	
Equestrian Facilities			
Objective i.	Preserve and enhance equestrian trails where they currently exist in the vicinity of Guajome Regional Park and to cooperate with San Diego County in planning regional recreational trails.	The project would not impact the existing equestrian uses in the surrounding area. The project would not result in the removal of any existing equestrian trails	The project would be in conformance with this objective.
Policy 6.11	The City shall protect and maintain the equestrian trails as a form of recreational opportunity and provide additional trail opportunities as part of the implementation of the City's Recreational Trails Element	The project would not provide equestrian facilities on site, but it would not impact the existing equestrian uses or result in the removal of any existing equestrian trails in the surrounding area.	The project would be in conformance with this policy.
Pedestrian Facilities			
Goal 1	Develop and maintain a safe pedestrian network that is free of barriers and hazards; that has sufficient lighting, signs, signals, street crossings, and buffers from vehicular traffic in order to create a sense of security for the pedestrian. Utilize corrective measures through engineering, education, and enforcement.	Pedestrian access within the site would be provided by 5-foot-wide sidewalks along the internal private loop. Sidewalks would also be constructed along the project frontage. Road improvements would include 40-foot curb to curb improvements including a ~~5.~~5-foot-wide parkway and a ~~4.~~5-foot-wide sidewalk.	The project would be in conformance with this goal.
Policy 6.7	The City shall require appropriate and sufficient screening, fencing,	The proposed project was assessed to ensure consistency with the Oceanside Subarea Plan by	The project would be in conformance with this policy.

Table 4.10-1. City of Oceanside General Plan Consistency Evaluation

Policy Number	Policy Text	Consistency Analysis	Conformance/ Nonconformance
	landscaping, open space setbacks, or other permanent mitigation or buffering measures between drainage way corridors and adjacent and surrounding land uses. The employed measures shall be of sufficient scope to minimize, to the maximum extent possible, negative impacts to adjacent surrounding land uses from the particular drainage way corridor.	reviewing the applicable Subarea Plan standards against the proposed project. Per Section 5.2.4 of the Subarea Plan (City of Oceanside 2010), a 50-foot-wide buffer biological buffer and 50-foot-wide planning buffer (total width of both equals 100 feet) are recommended from the southern edge of the riparian forest and southern willow riparian forest. The proposed project would impact a total of 0.36 acres of the recommended planning buffer.. ~~The proposed project would result in the loss of 0.66 acres of the biological buffer and 1.59 acres of the planning buffer for a total of 2.25 acres.~~ Although the Subarea Plan is not currently adopted, the City encourages applicants to adhere to the Subarea Plan to the extend feasible, including no-net loss of wetlands and the preservation of adequate buffers. Although the project would not provide the full 100-foot-wide buffer, project development has been sited to ensure all direct impacts to wetlands/riparian areas are eliminated. The northern portion of the project site overlaps with a hardline preserve zone as defined within the Subarea Plan (as shown in Figure 3 of Appendix C, the Biological Technical Report). Development of the proposed project would overlap with 0.03 acres of the proposed Subarea Plan preserve because of grading and fuel modification zones. The proposed project would modify the current proposed preserve boundary to conform with the site design, preserving everything to the northeast of the proposed project and existing development as shown on Figure 8 in Appendix C. The design of the project would ensure that the general location, acreage, and vegetation originally planned for	

Table 4.10-1. City of Oceanside General Plan Consistency Evaluation

Policy Number	Policy Text	Consistency Analysis	Conformance/ Nonconformance
		preservation in the Subarea Plan would remain with implementation of the proposed project.	
Circulation System Policy 12.5	Private land developers will continue to be responsible for constructing adjacent and internal Arterial Streets, Collector Streets, and Local Streets necessary to provide access and internal service to their subdivisions in a manner consistent with City standards. Developers will be required to contribute to and correct off-site impacts for local streets, collectors, and arterials to ensure and maintain a smooth, functional, and safe circulation system.	As described in the project description, the proposed single-family development would be connected by a private loop road within the project site. Guajome Lake Road would be improved the length of the property frontage, connecting to Albright Street. Road improvements would include 40-foot curb to curb improvements including a ~~5.~~5-foot-wide parkway and a ~~4.~~5-foot-wide sidewalk. The internal private road would be 28–32 feet wide with 5-foot-wide sidewalks. Circulation and emergency access drives have been designed in consultation with Oceanside Fire staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site.	The project would be in conformance with this policy.

3.12 Edits made to Section 4.11, Noise and Vibration

Page 4.11-8 through 4.11-9, Section 4.11.4 Impact Analysis

Table 4.11-4 summarizes these two distances to the apparent closest noise-sensitive receptor for each of the five sequential construction phases. Of note, construction activity associated with installation of up to 2,000 feet of 3-inch sewer force main proposed within Guajome Lake Road, is included within the building construction phase, and Guajome Lake Road improvements would be included in the paving phase. At the construction site boundary, this analysis assumes that up to only one piece of equipment of each listed type per phase will be involved in the construction activity for a limited portion of the 8-hour period. In other words, at such proximity, the operating equipment cannot "stack" or crowd the vicinity and still operate. For the acoustical centroid case, which intends to be a geographic average position for all equipment during the indicated phase, this analysis assumes that the equipment may be operating up to 8 hours per day.

Table 4.11-4. Estimated Distances between Construction Activities and the Nearest Noise-Sensitive Receptors

Construction Phase (and Equipment Types Involved)	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (feet)	Distance from Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (feet)
Site preparation (dozer, backhoe)	40	200
Grading (excavator, grader, dozer, scraper backhoe)	40	200
Building construction (crane, man-lift, generator, backhoe, welder)	~~40~~25	200
Paving (paver, roller, concrete mixer truck)	~~40~~15	200
Architectural coating (compressor)	40	200

Table 4.11-5. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Site preparation (dozer, backhoe)	73.7	67.4
Grading (excavator, grader, dozer, scraper backhoe)	79.9	70.1
Building construction (crane, man-lift, generator, backhoe, welder)	~~72.5~~76.0	65.2
Paving (paver, roller, concrete mixer truck)	~~70.8~~77.9	63.6
Architectural coating (compressor)	68.3	58.1

Page 4.11-11 through 4.11-12, Section 4.11.4 Impact Analysis

Stationary Noise Sources

The incorporation of new single-family homes and a mix of open space uses attributed to development of the proposed project would add a variety of noise-producing electromechanical equipment. Most of the noise-producing equipment or sound sources would be considered stationary, or limited in mobility to a defined area. Using a Microsoft Excel-based outdoor sound propagation prediction model, project-attributed operational noise at nearby community receptors was predicted using several assumptions:

- Treatment of exposed at-grade air-cooled condensing units as point-type sound emission sources
- Point-source sound propagation (i.e., 6 dB per doubling distance) that conservatively ignores acoustical absorption from atmospheric and ground surface effects

The private sewer lift station pump would be powered by a fairly small 8 horsepower (hp) motor and would be submerged in a wet well approximately 13 feet below ground surface. Under such conditions, noise levels from the operation of a sewer lift station would have negligible effects to existing noise-sensitive residential receptors; thus, operation of the private sewer lift station was not included in the outdoor sound propagation prediction model. Refer to Appendix J for quantitative details of the inputs and outputs that form the basis of this assessment. With respect to other exterior mechanical equipment, such sources are considered stationary and are evaluated below.

3.13 Edits made to Section 4.13, Public Services

Page 4.13-3, 4.13.1 Existing Conditions

Parks

~~The City maintains parks, recreational facilities, and community centers, including the beach, Buena Vista Lagoon, the San Luis Rey River, Calaveras Lake, Hosp Grove, golf courses, a dog park, skate parks, and trails.~~ The City currently has approximately 642 acres of park land and approximately 155 acres of public school-ground acreage (40% of the total school-ground acres), which are countable towards Oceanside's total park acreage, giving a total of approximately 797 acres of existing parkland. As of 2020, the City's parks and recreational facilities consist of 15 community and 17 neighborhood parks, 1 regional park, 3 recreation centers (Junior Seau Community Center, Joe Balderrama Recreation Center, and Melba Bishop Recreation Center), a YMCA and a Boys and Girls Club, 2 senior centers, 5 skateparks, and 2 pools. Other facilities include Oceanside's 3.5 miles of beach, the harbor, and the pier (City of Oceanside 2021a). Directly across Guajome Lake Road is Guajome Regional Park, which is owned and maintained by the County of San Diego.

The City's General Plan Recreational Trails Element focuses on the provision and maintenance of pedestrian, bicycle, and equestrian trail systems through the City. The City's General Plan Environmental Resource Management Element provides the City's recreational standards for parks, which includes the dedication of 5 acres of park per 1,000 residents (City of Oceanside 1975). In addition, the City's Parks and Recreation Division has a Parks and Recreation Master Plan to create a vision for the parks and recreation system. The Parks and Recreation Master Plan was updated in 2019 and provides a guide for the orderly development of future park, recreational, and open space facilities and programs in order to meet the community's current and future needs through 2030. Goals of the Master Plan include that residents have a maximum 15-minute walk for neighborhood parks or a 5-minute drive for community parks and special facilities (City of Oceanside 2019).

The closest community parks to the project site include 15.5-acre Rancho Del Oro Park, located approximately 2 miles west of the project site, and 10.5-acre John Landes Park and Recreation Center, located approximately 3.5 miles southwest of the project site. The closest regional park is Guajome Regional Park, located adjacent to the southern boundary of the project site. Please refer to Section 4.14, Recreation, for a detailed description of existing parks and recreational facilities within the City. The closest neighborhood parks to the project site are the 3-acre Spring Creek Park, located approximately 0.25 miles northeast of the project site, and 5-acre Alamosa Park, located 0.9 miles southwest of the project site.

There are two trailheads located within 0.25 mile of the project site. The Summit Trail Trailhead is located approximately 0.25 mile southwest of the project site off of Guajome Lake Road. Summit Trail merges into Willow Trail, which parallels Guajome Lake Road Santa Fe Trail Trailhead is located approximately 0.22 mile east of the project site off of Guajome Lake Road. These trails are maintained by the County Department of Parks and Recreation. The closest regional trail to the project site is the California Coastal Trail approximately 7.8 miles west

of the project site. The closest planned community trail within the Community Trails Master Plan is Trail 19 within the Bonsall Community Plan located approximately 1 mile southeast of the project site (County of San Diego 2005).

Page 4.13-11, Section 4.13.3 Impact Analysis

a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

Fire Protection?

Implementation of the project could result in an increase in demand on OFD as a result of new residential development at the project site. However, the project is located within an existing neighborhood and highly developed area of the City that already receives fire protection services. Additionally, as described in Section 4.12, Population and Housing, of this EIR, the proposed 83 residential units would result in an increase of approximately 233 people at the project site, which has been accounted for in the City's General Plan. The increase of approximately 233 people at the project site is not expected to result in a substantial increase in service calls to OFD.

As described above, OFD has eight firehouses located throughout the City. Of these stations, the closest to the project site is Station 6 (895 Santa Fe Avenue), located approximately 0.65 miles southeast of the project site (1.5 mile driving distance). Station 5 (4841 North River Road) is the second-closest station to the project site, located approximately 2 miles west of the project site (Oceanside Fire Department 2022). In addition to the City's eight fire stations, the City has an automatic aid agreement with the neighboring cities of Carlsbad and Vista. Per the agreement, when an emergency call comes into dispatch, the nearest emergency responder is notified regardless of the jurisdictional boundaries.

The project has been designed to provide adequate emergency access throughout the project site. Emergency access to the project site would be provided via the main entrance located on Guajome Lake Road. Circulation and emergency access drives have been designed in consultation with OFD staff to provide 28-foot minimum widths, with designated truck turnarounds and key staging areas throughout the project site. Prior to project development, OFD would be required to review and approve all final site plans for the project to ensure adequate site accessibility and response times. The adequacy of fire protection for an area takes into consideration response time, call volumes, fire flows, project fire safety features, service populations, compliance with fire fee requirements, and other considerations. Refer to Section 4.18, Wildfire and Appendix O, Fire Protection Plan of this EIR for a detailed analysis related to emergency response time for the project site. Additionally, the City has an established public facility development impact fee program (Municipal Code Chapter 32B and 32C) that requires new development to provide funds toward capital improvements for public services, including fire and emergency services. The project would be required to pay applicable developer impact fees in accordance with the City's requirements. Furthermore, the project would be required to comply with and pay toward the City of Oceanside CFD No. 2022-1 (Public Safety Services). Money collected from new developments in the CFD would help offset the costs of police and fire protection.

Therefore, while development of the project site would increase the demand on fire protection services in comparison to existing conditions, it is not anticipated that the project would result in the need for new fire

personnel or equipment or require construction of a new station or expansion of existing fire facilities. The project is expected to be adequately served by existing fire stations, and impacts related to fire protection are determined to be **less than significant.**

Parks?

The project site currently consists of a single-family residence, and the project would add 233 people to the site. The project could result in the potential for increased use of existing neighborhood and regional parks. In accordance with the City's Municipal Code, Chapter 32D, the project is required to either (1) create dedicated park land within or partly within the project site, whose acreage would be determined by the City; (2) dedicate land usable for recreation purposes in addition to paying a portion of the park impact fee; or (3) pay the entire park impact fee (City of Oceanside 2021b).

As described above, the City currently has approximately 642 acres of park land. In addition, 155.6 acres of public-school ground acreage (40% of the total school ground acres) are countable toward Oceanside's total park acreage, resulting in a total of 797 acres of existing parkland. As discussed above, the closest neighborhood park to the project site is the 3-acre Spring Creek Park located approximately 0.25 miles northeast of the project site, and 5-acre Alamosa Park, located 0.9 miles southwest of the project site. The closest community parks to the project site include acre 15.5-acre Rancho Del Oro Park, located approximately 2 miles southwest of the project site, and 10.5-acre John Landes Park and Recreation Center, located approximately 3.6 miles southwest of the project site. The closest regional park is Guajome Regional Park, located on the other side of Guajome Lake ~~Drive~~ Road southwest of the project site.

According to the City's General Plan Community Facilities Element, the City's goal is to provide a minimum of 5 acres of developed "community parks" per 1,000 residents within the City (City of Oceanside 1990). As described above, the City currently has a total of approximately 797 acres of existing parkland. As of 2020, the population within the City was 174,068, resulting in a parkland service ratio of approximately 4.5 acres per 1,000 residents. While this is below the current standard of 5 acres per 1,000 residents, the existing inventory includes only 2 acres of the 465-acre El Corazon Specific Plan area. Planned development of El Corazon Park would result in an additional 210 acres of parkland. With completion of El Corazon Park, the City's parkland service ratio would increase to approximately 5.7 acres per 1,000 residents (City of Oceanside 2021a). In addition to existing surrounding ~~City~~ parks and recreational facilities, as proposed by the project, residents of the project site would have private access to 35,151 square feet of private recreational and amenity area ~~6.92 acres of common open space~~. The City requires 300 square feet of open space per unit, and the project would create approximately 423 square feet of recreational open space per residence in addition to the private open space on each lot.

Although the project would potentially increase the utilization of existing parks and recreational facilities within the City, it is determined that the combination of proposed on-site ~~open space and~~ private open space, existing public park and recreational facilities in the project vicinity, and proposed future recreational facilities within the City would adequately serve future residents of the project site. Additionally, the project developer would be responsible for paying applicable development and park impact fees. Such fees for new residential development within the City go toward facilities such as (but not limited to) parks, public facilities, and schools. Therefore, it is determined that implementation of the project would have a **less-than-significant** impact on existing park facilities.

3.14 Edits made to Section 4.14, Recreation

Pages 4.14-1 through 4.14-2 Section 4.14.1 Existing Conditions

Surrounding Parks and Trails

~~The City maintains parks, recreational facilities, and community centers, including the beach, Buena Vista Lagoon, the San Luis Rey River, Calaveras Lake, Hosp Grove, Guajome Regional Park, golf courses, a dog park, skate parks, and trails.~~ The City currently has approximately 642 acres of park land. As of 2020, the City's parks and recreational facilities consist of 15 community and 17 neighborhood parks, 1 regional park, 3 recreation centers (Junior Seau Community Center, Joe Balderrama Recreation Center, and Melba Bishop Recreation Center), a YMCA and Boys and Girls Club, 2 senior centers, 5 skateparks, and 2 pools. Other facilities include Oceanside's 3.5 miles of beach and the City's harbor and pier (City of Oceanside 2021). Directly across Guajome Lake Road is Guajome Regional Park, which is owned and maintained by the County of San Diego.

The City's General Plan Recreational Trails Element focuses on the provision and maintenance of pedestrian, bicycle, and equestrian trail systems through the City. The City's General Plan Environmental Resource Management Element provides the City's recreational standards for parks, which includes the dedication of 5 acres of park per 1,000 residents (City of Oceanside 1975). In addition, the City adopted a Parks and Recreation Master Plan to create a vision for the parks and recreation system. The Parks and Recreation Master Plan (Master Plan) was updated in 2019 and provides a guide for the orderly development of future park, recreational, and open space facilities and programs in order to meet the community's current and future needs through 2030. Goals of the Master Plan include a 15-minute walk for neighborhood parks or a 5-minute drive for community parks and special facilities. The Master Plan defines five major categories of parks: neighborhood parks, community parks, community centers, regional parks, and special use parks. These park categories are described below (City of Oceanside 2019).

- Neighborhood parks are generally smaller parks that provide both passive and limited active recreation but tend to focus more on passive recreation. They are typically less than 5 acres in size and serve residents within a 15-minute walk. They generally do not include citywide facilities, such as gyms, pools, or sports fields.
- Community parks serve the daily recreational needs of the community. They are generally larger than 5 acres in size and service an area within a 5-minute drive. Citywide sports fields, pools, and court sports are concentrated in these locations.
- Community centers are community buildings that provide a wide range of activities serving the community as a whole. These centers often accommodate special events, recreational programs, offices, and community services. These facilities can be used by from users all over the community but should be accessible by a 5-minute drive.
- Regional parks are parks that are larger than 30 acres, serve the region, and provide a range of activities, including passive and active recreation opportunities, and often include open space, cultural, and/or natural resources. The sole park classified as regional is the 75-acre Guajome Regional Park, which includes 4.5 miles of multi-use trails, diverse habitats, and recreation areas featuring playgrounds, a basketball court, and a 33-site campsite.
- Special use parks comprise a broad category of facilities that focus on specific functions, themes, or user groups. They include facilities such as Heritage Park, the Municipal Golf Course, Oceanside Harbor and Oceanside Pier, and swim facilities.

The closest neighborhood parks to the project site are the 3-acre Spring Creek Park located approximately 0.25 miles northeast of the project site, and 5-acre Alamosa Park, located 0.9 miles southwest of the project site. The closest community parks to the project site include 15.5-acre Rancho Del Oro Park, located approximately 2 miles southwest of the project site, and 10.5-acre John Landes Park and Recreation Center, located approximately 3.6

miles southwest of the project site. The closest regional park is Guajome Regional Park, located on the other side of Guajome Lake Road southwest of the project site.

Planned parks in the City include El Corazon Park, located in the center of the City and bounded by Rancho Del Oro Drive on the east, Oceanside Boulevard on the south, El Camino Real on the west, and Mesa Drive on the north. In 2009, the El Corazon Specific Plan was adopted to guide and implement the vision for the 465-acre area. Future plans for the site include 212 acres of parks and recreation, 164 acres of habitat, 34 acres of civic services, 25 acres of commercial, 19 acres of village commercial, and 11 acres of hotel (City of Oceanside 2021).

There are two trailheads located within 0.25 mile of the project site. The Summit Trail Trailhead is located approximately 0.25 mile southwest of the project site off of Guajome Lake Road. Summit Trail merges into Willow Trail, which parallels Guajome Lake Road. Santa Fe Trail Trailhead is located approximately 0.22 mile east of the project site off of Guajome Lake Road. These trails are maintained by the County Department of Parks and Recreation. The closest regional trail to the project site is the California Coastal Trail approximately 7.8 miles west of the project site. The closest planned community trail within the Community Trails Master Plan is Trail 19 within the Bonsall Community Plan located approximately 1 mile southeast of the project site (County of San Diego 2005).

The City currently provides approximately 642 acres of parkland, including regional, community, special use, and neighborhood parks, as well as golf courses and community centers. In addition, 155.6 acres of public school grounds (40% of the total school grounds acreage) are countable toward Oceanside's total park acreage, giving a total of 797 acres of existing parkland. As of 2020, the population within the City was 174,068, resulting in a parkland service ratio of 4.5 acres per 1,000 residents. While this is below the current standard of 5 acres per 1,000 residents, the existing inventory includes only 2 acres of the El Corazon site. Planned development of El Corazon will result in an additional 210 acres of parkland. With completion of El Corazon, the parkland service ratio will increase to 5.7 acres per 1,000 residents (City of Oceanside 2021).

Pages 4.14-6 through 4.14-7, Section 4.14.4 Impact Analysis

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

As described in Chapter 4.12 of this EIR, Population and Housing, the project would construct 83 residential units, which would have the potential to house approximately 233 people, based on the City's Housing Element of an average household size of 2.8 persons per dwelling unit. An increase of 233 people at the currently vacant project site would result in the potential for increased use of existing neighborhood and regional parks. In accordance with the City's Municipal Code, Chapter 32D, the project is required to either (1) create dedicated park land within or partly within the project site, whose acreage would be determined by the City; (2) dedicate land usable for recreation purposes in addition to paying a portion of the park impact fee; or (3) pay the entire park impact fee (City of Oceanside 2020).

As described above, the City's parks and recreational facilities consist of 15 community and 17 neighborhood parks, 1 regional park, 3 recreation centers (Junior Seau Community Center, Joe Balderrama Recreation Center, and Melba Bishop Recreation Center), a YMCA and a Boys and Girls Club, 2 senior centers, 5 skateparks, and 2 pools. Residents can also enjoy more than 115 acres of school play areas as provided through Memorandums of Understanding with the Oceanside Unified School District. Furthermore, other City facilities are available for daily use, including Oceanside's 3.5 miles of beach, the harbor, and the pier (City of Oceanside 2021). The closest neighborhood parks to the project site are the 3-acre Spring Creek Park, located approximately 0.25 miles northeast of the project site, and 5-acre Alamosa Park,

located 0.9 miles southwest of the project site. The closest community parks to the project site include 15.5-acre Rancho Del Oro Park, located approximately 2 miles southwest of the project site, and 10.5-acre John Landes Park and Recreation Center, located approximately 3.6 miles southwest of the project site. The closest regional park is Guajome Regional Park, located on the other side of Guajome Lake Road southwest of the project site.

The project proposes a sidewalk along the north side of Guajome Lake Road along the project site frontage and extending northwest to Albright Street and does not propose any direct connection to Guajome Regional Park. During construction of project-related road improvements proposed for Guajome Lake Road, temporary road closure to this segment of road could occur. However, the project would be required to implement a traffic management plan to insure proper emergency access to the project site and surrounding area during construction, including identification of alternate routes during any temporary closure of the segment of Guajome Lake Road to be improved. Therefore, park users would be able to access park entrances during construction of Guajome Lake Road improvements. As described above the closest planned community trail to the project site is approximately 1 mile from the project site and has not been constructed, therefore the project would not result in an impact to existing county trail facilities.

According to the City's General Plan Community Facilities Element, the City's goal is to provide a minimum of 5 acres of developed "community parks" per 1,000 residents within the City (City of Oceanside 1990). As described above, the City currently has a total of 797.7 acres of existing parkland. As of 2020, the City's population was 174,068, resulting in a parkland service ratio of 4.5 acres per 1,000 residents. Although this is below the current standard of 5 acres per 1,000 residents, the existing inventory includes only 2 acres of the 465-acre El Corazon Specific Plan area. Planned development of El Corazon Park will result in an additional 210 acres of parkland. With completion of El Corazon Park, the parkland service ratio will increase to 5.7 acres per 1,000 residents (City of Oceanside 2021).

The proposed project would include approximately 35,151 square feet of private recreational and amenity area within the development. Additionally, each proposed residence would include a private front and rear yard. The City requires 300 square feet of open space per unit, and the project would create approximately 423 square feet of open space per residence in addition to the private open space provided for each lot.

Although the project would potentially increase the utilization of existing parks and recreational facilities within the City; it is determined that the combination of proposed open space amenities on site, existing park and recreational facilities in the area, and proposed future recreational facilities within the City would adequately serve future residents of the project site. Additionally, the project developer would be responsible for applicable developer and park impact fees. Such fees for new residential development within the City go toward facilities such as (but not limited to) parks, public facilities, and schools. Furthermore, the increase of approximately 233 people at the project site has been accounted for in the City's General Plan. Therefore, it is determined that implementation of the Project would have a **less-than-significant** impact on existing recreational facilities.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

As described in response to Threshold a) above, each residence would include a private front and rear yard. Overall, a total of approximately 35,151 square feet of recreational open space would be provided by the project. The City requires 300 square feet of open space per unit, and the project would create approximately 423 square feet of recreational open space per residence in addition to the private open

space on each lot. The project does not propose any improvements to offsite trails offsite. The project is located within the Equestrian Overlay District. The Equestrian Overlay District seeks to provide recreational opportunities by establishing trail networks within the Guajome Neighborhood Planning Area. The project requests waivers from the Equestrian Overlay District development standards. The project would not provide equestrian facilities on site; however, it would not impact the existing equestrian uses in the surrounding area.

3.15 Edits made to Section 4.15, Traffic and Circulation

Page 4.15-1, Section 4.15.1 Existing Conditions

The City of Vista municipal boundary is located approximately 0.5~~1~~ miles east of the project site.

Pages 4.15-10-11, Section 4.15.4 Impact Analysis

Construction of the proposed project would have the potential to create temporary traffic impacts through the generation of construction-related traffic (construction worker vehicles; vendor and haul trucks) to and from the project site. Currently, Guajome Lake Road is an unpaved dirt road from Albright Street to just east of Old County Road. This area is currently not up to fire code standards, but as described in Chapter 3, the project implementation would include paving this road and ensuring that the road is up to fire code standards. The paving of the road and construction of the off-site sewer force main would result in temporary road closure during construction of these off-site improvements~~the paving process~~. The project would be required to implement a traffic management plan as a condition of approval to ensure proper emergency access to the project site and surrounding area during project construction, including construction of the off-site improvements. The remainder of the project would not require the full closure of any public streets or roadways during construction or operations and would not impede access of emergency vehicles to the project site or any surrounding areas. Further, the project would provide all required emergency access in accordance with the requirements of the Oceanside Fire Department.

Page 4.15-13, Table 4.15-6, Section 4.15.4 Impact Analysis

Table 4.15-6. Existing Plus Project Street Segment Operations

Street Segment	Jurisdiction	Functional Capacity	Capacity (LOS C)[a]	Existing			Existing Plus Project			Change in V/C[b]	Improvement Required?
				ADT	LOS	V/C	ADT	LOS	V/C		
Guajome Lake Road											
~~North of Meadowbrook Drive~~ Southeast of Albright Street to southern end of Project site frontage	Oceanside	~~Local Street~~ Dirt Roadway	2,200	744	C	0.338	~~415~~	~~C~~	~~0.527~~	~~0.189~~	~~No~~
Southeast of Albright Street to southern end of Project site frontage	Oceanside	Collector	7,500				1,159	A	0.155	0.155	No

Source: Appendix K, Draft Local Transportation Assessment.
Notes: LOS = level of service; ADT = average daily traffic; V/C = volume to capacity ratio.
[a] Capacities based on Circulation Element Table 3-3: Circulation Element Roadway Classification LOS and Capacity (City of Oceanside 2012).
[b] Change in V/C = increase in V/C due to project.

Page 4.15-17, Section 4.15.4 Impact Analysis

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

As described above and in Chapter 3 of this EIR, the project site is located along Guajome Lake Road. Currently, Guajome Lake Road is an unpaved dirt road from Albright Street to just east of Old County Road. This area is currently not up to fire code standards, but as described in Chapter 3, project implementation would include paving this road and ensuring it is up to fire code standards. The project would install traffic calming measures on Guajome Lake Road along the project frontage and/or in the vicinity of the project site, which will be required as a condition of project approval. Additionally, road improvements would include 40-foot curb to curb improvements, including a 5.0-foot-wide parkway and a 5.0-foot-wide sidewalk. The internal private loop road would be 28–32 feet wide, with 5-foot-wide sidewalks. Circulation and emergency access drives have been designed in consultation with Oceanside Fire Department staff to provide 28-foot minimum widths, with designated truck turnarounds and key staging areas throughout the project site.

The project does not propose any sharp curves or dangerous intersections that could result in the potential for increased hazards. All proposed circulation and vehicle use on site would be typical of a single-family residential development. Additionally, final project plans would be subject to City and Oceanside Fire Department review to ensure adequate access points and mobility. For these reasons, impacts are determined to be less than significant.

d) Would the project result in inadequate emergency access?

The project would provide two access points for emergency responders along the southern boundaries of the project site along Guajome Lake Road. Currently, Guajome Lake Road is an unpaved dirt road from Albright Street to just east of Old County Road. This area is currently not up to fire code standards, but as described in Chapter 3, project implementation would include paving this road and ensuring that the road is up to fire code standards. The paving of the road and construction of the off-site sewer force main would result in temporary road closure during construction of these off-site improvements ~~the paving process~~. The project would be required to implement a traffic management plan to ensure proper emergency access to the project site and surrounding area during project construction, including construction of the off-site improvements. The remainder of the project would not require the full closure of any public streets or roadways during construction or operations and would not impede access of emergency vehicles to the project site or any surrounding areas. Further, the project would provide all required emergency access in accordance with the requirements of the Oceanside Fire Department.

3.16 Edits made to Section 4.16, Tribal Cultural Resources

Page 4.16-1, Section 4.16.1 Existing Conditions

The approximately 16.78-acre project site is currently a disturbed, partially vacant property with an existing residence. The cultural study area (or area of potential effect [APE]) includes the entire project property and areas of off-site improvements, which include paving Guajome Lake Road between the project frontage and Albright Street, approximately 1,200 linear feet, and installation of up to 2,000 linear feet of 3-inch sewer force main within Guajome Lake Road. Much of the project site appears to have been previously disturbed. The project site has been previously impacted by grading and land development on adjacent parcels. The project site shows signs of disturbances related to previous grading, ~~recent Sprinter construction staging,~~ evidence of illegal dumping, and

evidence of moving activities. There is an existing residence located just south of the creek. Vegetation within the project APE includes primarily non-native grasslands and disturbed areas. All of the land that would be affected by offsite improvements is disturbed or developed. Ornamental plantings occur along the southeastern edge of the site, bordering an existing residential development, and small isolated patches of coastal sage scrub exist in the western and northwestern portions of the project APE.

3.17 Edits made to Section 4.17, Utilities and Service Systems

Page 4.17-10, Section 4.17.4 Impact Analysis

As detailed in Appendix ~~M,~~ N, the proposed on-site sewer would convey sewage from each residence into a private 4-inch PVC sewer mainline, which would convey sewage to proposed manholes located within the private road that would be constructed as part of the project.

3.18 Edits made to Section 4.18, Wildfire

Page 4.18-9 through 4.18-10, Section 4.18.4 Impact Analysis

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project would require the installation of water sources, underground utilities, and internal roads typical of a new ~~mixed use~~ single-family residential development. The project would not require installation of new public roads, emergency water sources, or any overhead utility lines.

Road improvements proposed for the project include 40-foot curb to curb improvements, including a 5-foot-wide parkway and a ~~4.5~~5-foot-wide sidewalk. The internal private road would be 28 to 32 feet wide with 5-foot-wide sidewalks. Each proposed home would include a two-car garage and a private driveway that would allow for additional parking of two more cars. All fire access roads would be designed and maintained to support the imposed loads of fire apparatus (not less than 75,000 pounds), would be consistent with code requirements for asphaltic pavement surface, and would also meet all criteria outlined in Appendix O, Section 3.2.1. Project site access, including road widths and connectivity, would be consistent with the City's roadway standards and CFC Section 503. The project would also include supporting amenities, including a recreational area, open space, and landscaping.

Water fire flows would be consistent with OFD requirements for a residential development. The City's water service area requires new development to meet a requirement of a minimum 1,500-gallons-per-minute fire flow from any hydrant. The pressures in the project development would remain above 20 pounds per square inch for a minimum duration of 2 hours when meeting the fire requirements for the City's water service area and OFD fire flows (Appendix O). Fire hydrants would be located along fire access roadway(s) as determined by the OFD fire marshal in consultation with the City's water department to meet operational needs, at intersections, and at distances listed in Table C102.1 of the CFC, 2019 edition. The approved permanent fire hydrants would be installed, tested, and fully operable/placed in service before combustible

materials are brought on site. All fire hydrants installed for the project would be consistent with the City's Design Standards as outlined in Appendix O, Section 3.5.

As outlined in Appendix O to this EIR, an important component of a fire protection system is the FMZ. FMZs are typically designed to gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones and irrigated zones adjacent to each other on the perimeter of the structures exposed to the wildland–urban interface. The project is proposing a site-specific FMZ program with additional measures that are consistent with the intent of the standards. Due to site constraints, it is not possible to achieve a full 100-foot FMZ width for every project lot, specifically in the northwestern portion of the development adjacent to the riparian forest habitat and along the western and eastern property boundaries. As such, the Fire Protection Plan prepared for the project (see Appendix O) provides both City and state fire and building code required elements for constructing a residential structure in a Very High Fire Hazard Severity area and enhanced, code-exceeding mitigation measures ~~–~~that would be incorporated as project design features for the lots with non-conforming fuel modifications zones, as outlined in Chapter 3, Project Description, of this EIR (PDF-WF-1 through PDF-WF-3). ~~The code exceeding mitigation measures~~ Theses project design features are customized for the project site based on the fire behavior modeling analysis results and site fire environment evaluation, and they focus on meeting or exceeding the fire safety provided by a City-defined, full 100 feet of FMZ.

As indicated in the Fire Protection Plan Letter Report (Appendix O), the FMZs and additional fire protection measures proposed for the project provide equivalent wildfire buffer but are not standard zones. Rather, they are based on a variety of analysis criteria including predicted flame length, fire intensity (British thermal units), site topography and vegetation, extreme and typical weather, the positions of structures on pads, positions of roadways, adjacent fuels, fire history, current vs. proposed land use, neighboring communities relative to the proposed project, and type of construction. As outlined in Section 4.2 of Appendix O, it is anticipated that the proposed structures would be able to withstand the short-duration, low to moderate intensity fire and ember shower that is projected from off-site, adjacent fuels based on factors identified throughout the Fire Protection Plan. Additionally, the project would adhere to City and state fire and building code required measures and code-exceeding measures outlined in Section 4.1 of Appendix O and Chapter 3, Project Description of this EIR.

The project site would have ~~two~~ three FMZs that extend across the project site, as depicted in Figure 4 of Appendix O. This defensible space consists of a combination of an irrigated, well-maintained landscape that consists of fire-resistant plants within 30 feet of the building (Zone1) and a thinned landscape in the areas between 30 and 100 feet (Zone 2) from the structures (where applicable). The proposed FMZs would follow the requirements outlined in Section 3.11.2 of Appendix O. Based on the predicted fire intensity and duration, along with flame lengths for this project site and the provided FMZs, the highest concern is considered to be from firebrands or embers as a principal ignition factor. Therefore, the project site, based on location and ember potential, is required to include the latest ignition- and ember-resistant construction materials and methods for roof assemblies, walls, vents, windows, and appendages, as mandated by the California Building Code (Chapter 7A). Additionally, a space extending 5 feet on a horizontal plane from the exterior wall surface of the buildings shall consist of continuous hardscape or limited fire-resistant plantings acceptable to the Fire Authority Having Jurisdiction (FAHJ). Vegetation in this space would not exceed 6 inches ~~to 18 inches~~ in height, and irrigation is required. Additionally, this space would be free of combustible materials, and the use of mulch is prohibited (Zone 0) (Appendix O).

Response to the project site from the closest existing OFD fire station (Station 6) would ~~achieve a 3- to 4-minute travel time for the entire project site. This analysis indicates that the first arriving engine from Station 6 could respond within OFD's 5 minute response time goal to an estimated 5% of the project, with a response time of up to 6.5 minutes for the remainder of the project. A final decision regarding the need for mitigation for not strictly complying with OFD's response time goal would be at OFD's discretion. Although the project would exceed the 5 minute response time goal for most of the project area, it would not substantially exceed the goal anywhere on the project site.~~ be expected to achieve a response time of less than five minutes to approximately 5% of the project and a response time of 5 to 6 minutes to approximately 90% of the project. This is considered to be substantially consistent with the Oceanside Fire Department's 5 minute response time goal and fully compliant with the National Fire Protection Association's national guideline of having a fire response time of 6 minutes and 30 seconds, 90% of the time (Appendix O). Additionally, there are additional firefighting resources within the vicinity of the project site, including OFD Station 5 and OFD Station 8. OFD Station 5 is located approximately 2.5 miles from the project site, and Station 8 is located approximately 4.6 miles from the project site. As analyzed in Appendix O to this EIR, service level requirements are not expected to be significantly impacted, with an increase of approximately two calls per month for the local fire response system. Therefore, the project is not expected to cause a decline in emergency response times. The requirements described in the Fire Protection Plan (see Appendix O) are intended to aid firefighting personnel and minimize the demand placed on the existing emergency service system.

Project development and associated on-site infrastructure would not exacerbate fire risks. As described previously, the project is not located within or adjacent to a VHFHSZ. Additionally, these improvements would be constructed within an existing right-of-way or within the project site boundary. The project would not require the installation or maintenance of such infrastructure as would exacerbate fire risk, and therefore, impacts are determined to be **less than significant**.

3.19 Edits made to Chapter 8, Alternatives

Page 8-7, Section 8.4.2.2, Comparison of Significant Effects

The Reduced Development Footprint Alternative would result in a reduced ground disturbance area on the project site based upon the reduced development footprint layout. Because reduced ground disturbance would occur under this alternative, there would be less potential to impact existing biological resources on site. Specifically, this alternative would result in minimized impacts to Coastal Sage Scrub in comparison to the project by pushing the development footprint south by approximately 30 feet from the limits of coastal sage scrub. However, under this alternative, an approximately 25-foot shoring wall would be required, which could result in some permanent impacts to coastal sage scrub, although they would be substantially reduced in comparison to the proposed project. ~~Although t~~This alternative layout would ~~potentially~~ reduce impacts to biological resources on site and may allow for on-site compensatory mitigation to occur to some extent; however, its primary effect would be to reduce the amount of impacts to Coastal Sage Scrub and reduce the area needed for mitigation. However, impacts would still occur, and this alternative is expected to require mitigation measures similar to MM-BIO-1 through MM-BIO-5 proposed for the project to reduce significant impacts to biological resources.

3.20 Edits made to Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report

Page 1, Section 1.3 Project Description

The proposed Project would involve a request for approval of a Development Plan, Tentative Map, and Density Bonus to allow for the construction of 83 ~~84~~ single-family homes on approximately 9.68 acres of the 16.6-acre project site. The Project is subject to State Density Bonus Law (Government Code Section 65915) and local Density Bonus provisions (Section 3032 of the Zoning Ordinance). The Project area consists of an approximately 16.6-acre property covering one parcel (APN 157-412-15-00) (Figure 2).

Four ~~Nine~~ of the proposed 83 ~~84~~ single-family homes (5 ~~15~~% of the total) would be designated as deed-restricted affordable housing. The remaining 78 ~~75~~ homes would be sold at market rate.

Page 3, Figure 1: Project Location (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 27, Section 2.4.2.1 Approach and Methodology – Construction Emissions

For purposes of estimating project emissions, and based on CalEEMod default values and similar projects, it is assumed that construction of the project would occur 5 days per week and commence in July 2023 and would last approximately 18 months, ending in December 2024[5]. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

- Site Preparation: 10 days (July 2023)
- Grading: 1 month (July 2024~~3~~ – August 2023)
- Building Construction: 1~~0~~5 months (August 2023 – October 2024)
- Paving: 1 month (October 2024 - November 2024)
- Architectural Coating: 1 month (November 2024 – December 2024)

Of note, construction activity associated with the off-site sewer force main is included within the building construction phase. Construction-worker and vendor trip estimates by construction phase were based on CalEEMod default data. To be balanced on-site. The construction equipment mix and vehicle trips used for estimating the project-generated construction emissions are shown in Table 5.

[5] The Summer 2023 start date represented the earliest possible start date at the time the air quality technical report was written. Assuming an earlier start date for Project construction represents the worst- case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be less due to more stringent standards for off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles.

Table 5. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Site Preparation	18	6	2,094 ~~0~~	Graders	3	8
				Tractors/loader/ backhoes	4	8
Grading	20	6	6,281 ~~0~~	Excavators	2	8
				Graders	2	6
				Rubber-tired dozers	1	6
				Scrapers	2	8
				Tractors/loader/ backhoe	2	7
Building Construction	136	50	0	Cranes	1	4
				Forklifts	2	6
				Generator Sets	1	8
				Tractors/loader/ backhoes	1	8
				Welders	3	8
Paving	16	6	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	28	6	0	Air compressors	1	6

Notes: See Appendix A for details.

Page 29, Section 2.4.2.2 Approach and Methodology - Operational Emissions

The project would not construct any wood burning stoves or ~~natural gas~~ fireplaces, as required by ~~PDF-AQ-1~~ MM-AQ-2.

Page, 31, Section 2.5.1 Threshold 1

Implementation of the project would result in an increase in housing of 83 ~~84~~ single family residential units. The City of Oceanside General Plan identifies the site as ~~Single Family Residential~~ Single-Family Detached Residential and the project site is zoned ~~Single Family Detached (SFD-R)~~ Single-Family Residential – Scenic Park Overlay and Equestrian Overlay (RS-SP-EQ) (City of Oceanside ~~2002~~2022). The existing land use designation and zoning allows for single family detached units. The proposed project is consistent with the underlying land use and zoning for the project site but would require a waiver under the state Density Bonus Law.

Under the Density Bonus Law, the provision of 5% ~~15%~~ very-low-income units allows the applicant to receive a density bonus of 20 ~~50~~%, allowing additional market-rate units to be constructed. Of the proposed 83 ~~84~~ single-family homes, 4 ~~9~~ of the units would be affordable/low-income units, and the remaining 79 ~~75~~ units would be

considered market-rate units, which complies with the Density Bonus Law provisions regarding affordable housing. Therefore, the proposed mix of residential units totaling 83 ~~84~~ units is consistent with the underlying uses anticipated for the project site and consistent with the provisions allowed under State Density Bonus Law.

Furthermore, the most recent Regional Housing Needs Assessment from SANDAG stated that Oceanside needs to build 5,443 units from 2021 through 2029 (SANDAG 2020). The City has a projected deficit of 1,268 very-low units, 718 low-income units, 883 moderate units, and 2,574 above-moderate income units (SANDAG 2020). The proposed project is expected to bring 83 ~~84~~ units to market in 2025, including 4 ~~9~~ low-income units and 79 ~~75~~ above moderate-income units, which would be within SANDAG's growth projection for housing during the 6th Cycle planning horizon (i.e., April 2021 – April 2029). Therefore, the proposed project would not conflict with SANDAG's regional growth forecast for the City (Appendix B).

Based on this, the project would be consistent with the growth assumptions in the City's General Plan and would not conflict with the RAQS or SIP. As the project is consistent with the zoning designation and is anticipated in the City's General Plan and SANDAG's growth projections, implementation of the project would not conflict with the SIP and RAQS. Therefore, the project would not conflict with or obstruct implementation of an applicable air quality plan, and impacts would be **less than significant.**

Page 32, Section 2.5.2 Threshold 2

Table 6. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
2023	3.86 ~~3.38~~	62.31 ~~34.81~~	36.22 ~~28.62~~	0.19 ~~0.06~~	14.30 ~~10.30~~	7.01 ~~5.76~~
2024	244.36 ~~244.35~~	15.78	19.97	0.05	2.09	0.99
Maximum	**244.36** ~~244.35~~	**62.31** ~~**34.81**~~	**36.22** ~~**28.62**~~	**0.19** ~~**0.06**~~	**14.30** ~~**10.30**~~	**7.01** ~~**5.76**~~
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	**Yes**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District.
See Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod "mitigated" output, which accounts for implementation of the project's fugitive dust control strategies, including watering of the project site and unpaved roads two times per day, restricting vehicle speed on unpaved roads to 15 miles per hour.

Page 33, Section 2.5.2 Threshold 2

Table 7. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions After Mitigation

Construction Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2023	3.86 ~~3.38~~	63.32 ~~34.81~~	36.22 ~~28.62~~	0.19 ~~0.06~~	14.30 ~~10.30~~	7.01 ~~5.76~~

2024	66.26 ~~55.14~~	15.90 ~~15.78~~	19.97	0.05	2.09	0.99
Maximum	***66.26*** ***~~55.14~~***	***66.32*** ***~~34.81~~***	***36.22*** ***~~28.62~~***	***0.19*** ***~~0.06~~***	***14.30*** ***~~10.30~~***	***7.01*** ***~~5.76~~***
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	No	No	No	No	No	No

Source: Appendix A.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

- Operational Emissions

Table 8 presents the maximum daily area, energy, and mobile source emissions associated with operation (year 2025) of the project. Operational year 2025 was assumed upon completion of construction. The values shown are the maximum summer or winter daily emissions results from CalEEMod and are compared to the SDAPCD thresholds of significance. Details of the emission calculations are provided in Appendix A.

Table 8. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions - Unmitigated

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Area	134.22 ~~132.13~~	2.59 ~~2.28~~	165.61 ~~146.65~~	0.29 ~~0.03~~	22.29 ~~19.19~~	22.29 ~~19.19~~
Energy	0.07	0.60	0.26	<0.01	0.05	0.05
Mobile	2.35	2.54 ~~2.34~~	21.59 ~~21.04~~	0.05	38.81 ~~5.14~~	4.74 ~~1.39~~
Total	**163.65** **~~134.56~~**	**5.73** **~~5.22~~**	**187.45** **~~167.94~~**	**0.34** **~~0.28~~**	**61.14** **~~24.38~~**	**27.07** **~~19.28~~**
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	**~~No~~Yes**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = coarse particulate matter; PM2.5 = fine particulate matter; SDAPCD = San Diego Air Pollution Control District; <0.01 = reported emissions are less than 0.01.
See Appendix A for complete results.
Totals may not sum due to rounding. Residential units were not equipped with woodstoves.
The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect operational year 2025.

As shown in Table 8, the combined daily area, energy, and mobile source emissions would not exceed the SDAPCD operational thresholds for NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. However, the project would exceed the SDPACD VOC emissions threshold largely because of area source emissions from wood fireplaces.

However as shown in Table 9, implementation of mitigation measure MM-AQ-2, which would ensure that no wood burning fireplaces would be included in the project design, would reduce VOC emissions to below the SDAPCD threshold. Thus, impacts associated with project-generated operational criteria air pollutant emissions would be **less than significant after mitigation.**

Table 9. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	5.92 ~~5.76~~	0.08 ~~0.85~~	6.84 ~~7.25~~	0.00 ~~0.01~~	0.04 ~~0.10~~	0.04 ~~0.10~~
Energy	0.07	0.60	0.26	0.01	0.05	0.05
Mobile	2.35	2.51 ~~2.34~~	21.33 ~~21.04~~	0.05	38.34 ~~5.10~~	4.68 ~~1.39~~
Total	***8.32*** ***~~8.18~~***	***3.18*** ***~~3.79~~***	***28.43*** ***~~28.54~~***	***0.05*** ***~~0.06~~***	**38.43** ***~~5.29~~***	***4.77*** ***~~1.54~~***
SDAPCD Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	*No*	*No*	*No*	*No*	*No*	*No*

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego Air Pollution Control District. <0.01 = reported value is less than 0.01.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

Appendix A, CalEEMod Output Files (see Attachment B, Revised Appendix A, CalEEMod Output Files, of Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report, of this Final EIR)

3.21 Edits made to Appendix C, Biological Resources Technical Report

Page 1, Section 1.1, Project Description

The project applicant would include the following project design features into the design and implementation of the project that would reduce or negate potential impacts.

- **PDF-BIO-1. Fencing** The north portion of the site's existing topographical constraints, including steep slopes, would serve as a natural deterrent to resident access and recreational use within the open space areas in the northern portion of the site. Regardless, the project design includes a wall along the northern development perimeter where the slope will be constructed. Fencing will be placed around the remaining interface between development and open space to deter residents from recreating in the avoidance areas. The HOA shall be responsible for removing trash and prohibiting trespassing in the fenced open space area in the northern portion of the project site.

- **PDF-BIO-2. HOA Education** The HOA shall establish an education program for homeowners regarding responsible pet ownership. The program shall encourage a) keeping pets indoors, especially at night; b) having pets neutered or spayed to reduce unwanted reproduction and long-range wandering; c) belling of cats to reduce their effectiveness as predators; and d) prohibiting release of unwanted pets into the wild.

Page 17, Section 5.1, Vegetation Communities and Land Covers

Table 2. Vegetation Communities and Land Covers

Vegetation/Land Cover Type	On-Site Acreage	Off-Site Acreage	Total Acreage
Diegan coastal sage scrub	2.20	—	2.20
Non-native grassland	8.84	—	8.84
Disturbed habitat	0.45	0.12	0.57
Urban/developed	1.23	~~0.19~~0.52	~~1.42~~1.75
Southern arroyo willow riparian forest	2.87	—	2.87
Non-native riparian	0.58	—	0.58
Non-vegetated channel	0.32	—	0.32
Riparian forest (disturbed)	0.30	—	0.30
Total[a]	16.78	~~0.31~~0.64	~~17.10~~17.43

Page 18, Section 5.1.4, Urban/Developed

Urban/developed refers to areas that have been constructed on or disturbed so severely that native vegetation is no longer supported. Within the proposed project site, urban/developed refers to a home with associated structures and a yard with ornamental vegetation. Areas subject to offsite improvements, which include paving an approximately 200-foot-long section of Guajome Lake Road and constructing a 3-inch sewer force main approximately 2,000 feet along Guajome Lake Road, are also located within the urban/developed land cover type.

Page 20, Section 5.5, Special-Status Wildlife

The following special-status species were observed within the proposed project site: Cooper's hawk (*Accipiter cooperii*), white-tailed kite (*Elanus leucurus*), yellow warbler (*Setophaga petechia*), and coastal California gnatcatcher. Appendix D-1, Special-Status Wildlife Species Detected or Potentially Occurring within the Project Site, lists the special-status wildlife species known to occur within the vicinity. While Appendix D-2 lists, Special-Status Wildlife Species with Low Potential and Not Expected to Occur within the Project Site~~, lists the special-status wildlife species known to occur within the vicinity~~.

Page 20, Section 5.5, Special-Status Wildlife

Crotch's bumble bee (*Bombus crotchii*) is not threatened or endangered in California; however, it is a candidate species for listing under CESA. This species occurs almost exclusively in California, where it inhabits open grassland and scrub habitats from Southern to Central California (Xerces Society et al. 2018). Bumble bees, including Crotch's bumble bee, are generalist foragers and have been reported visiting a wide variety of flowering plants. This species has a very short tongue and is therefore best suited to forage at open flowers with short corollas. Nectar plants known to be visited by Crotch's bumble bee include the genera *Asclepias*, *Chaenactis*, *Lupinus*, *Medicago*, *Phacelia*, and *Salvia* (Williams et al. 2014; Xerces Society et al. 2018), but it is assumed that flowering plants in other genera could also support foraging by this species.

Crotch's bumble bee has a moderate potential to forage and nest within the coastal sage scrub onsite, although it has a low potential to nest in the non-native grassland. Suitable floral resources are present in the study area to support foraging Crotch's bumble bees. The coastal sage scrub onsite contains nectar source species, such as deerweed

(*Acmispon glaber)* and miniature lupine *(Lupinus bicolor).* The non-native grassland within the project site is regularly mowed, limiting the potential for floral resources necessary for the species. Known occurrences of the species within 5-7 miles of the study area are close to the coast (7 miles) and near Lake Calavera (5 miles) (CDFW 2025; Richardson 2025).

Page 23, Section 6.2, Indirect Impacts

The project applicant would include the following project design features into the design and implementation of the project that would reduce or negate potential impacts (see Section 1.1, Project Description). A wall and fencing will be placed around the northern perimeter of the development and open space interface to deter residents from recreating in the avoidance areas (PDF-BIO-1).

The intrusion of pets such as domestic cats into sensitive habitat adjacent to the development could negatively affect populations of native wildlife. However, the proposed development is situated in an area already disturbed by non-native species and human activity. Additionally, residents would be educated about prohibiting release of unwanted pets into the wild ,the importance of keeping cat food and pet cats indoors, and having pets neutered or spayed to reduce unwanted reproduction and long-range wandering, per PDF-BIO-2.

Page 24, Section 6.5.1, Direct Impacts

Table 5. Permanent Impacts, Mitigation, and On-Site Avoidance within the Proposed Project Site

Vegetation/ Land Cover Type	Impacts (acres)		Total Impacts (acres)[a]	Mitigation		On-site Avoidance
	Development	Improvement of Guajome Lake Road and Sewer Force Main		Ratio[b]	Acres Required	
Diegan coastal sage scrub	1.25	—	1.25	2:1	2.5	0.95
Non-native grassland	8.29	—	8.29	0.5:1	4.14	0.55
Non-native riparian	—	—	—	—	—	0.58
Non-vegetated channel	—	—	—	—	—	0.32
Riparian forest (disturbed)	—	—	—	—	—	0.30
Southern willow riparian forest	—	—	—	—	—	2.87
Urban/developed	0.69	~~0.19~~0.52	~~0.87~~1.20	N/A	0	0.55
Disturbed habitat	0.09	0.12	0.21	N/A	0	0.36
Total[b]	**10.31**	~~**0.31**~~**0.64**	~~**10.62**~~ **10.95**	**—**	**6.64**	**6.48**

Notes:

[a] Acreages may not sum precisely due to rounding.

[b] Per Table 5-2, Mitigation Standards for Impacts to Natural Vegetation and Habitat, in the Subarea Plan (City of Oceanside 2010). Impacts to coastal sage scrub in the Coastal Zone and Agency approved areas of the Offsite Mitigation Zone shall be mitigated at a 2:1 ratio.

Of the approximately 16.78-acre proposed project site and 0.64 acres of offsite improvement areas, the proposed project would result in direct permanent impacts to ~~10.31~~10.95 acres, ~~including an additional 0.31~~ of which 0.64 acres associated with off-site improvements to Guajome Lake Road and the off-site sewer line (~~10.62 acres total~~). Of ~~10.62~~10.95 acres of impacts, 9.54 acres is too sensitive vegetation communities and includes 1.25 acres of impacts to coastal sage scrub and 8.29 acres of impacts to non-native grassland. Off-site impacts are limited to developed and disturbed areas.

Page 26, Section 6.5.1, Direct Impacts

- The undeveloped riparian habitats within the proposed project site have the potential to support several special-status wildlife as shown in Appendix D-1. White-tailed kite, Cooper's hawk, and yellow warbler were observed on site, while least Bell's vireo was observed foraging in adjacent off-site habitat. The coastal sage scrub habitat on site supports nesting coastal California gnatcatcher and could support other special-status species such as Crotch's bumble bee (see Appendix D-1). The proposed project would not result in the direct loss of any riparian habitat that is known to support least Bell's vireo or white-tailed kite or any other special-status species, but would result in the permanent loss of 1.25 acres of habitat utilized by coastal California gnatcatcher as well as 8.29 acres of potential foraging habitat for white-tailed kite and Cooper's hawk. Direct impacts to this habitat would be mitigation through implementation of **MM-BIO-1**, which would provide for the creation and preservation of high-value habitat at an ~~conservation bank~~existing preserve.

Pages 27 through 31, Section 6.5.1 Direct Impacts

- MM-BIO-7 Biological Monitor Requirements and Duties. A qualified biologist shall be on site daily during initial clearing/grubbing and weekly during grading activities within 500 feet of preserved habitat to ensure compliance with all project-imposed mitigation measures. The biologist shall be available during pre-construction and construction phases to review grading plans, address protection of sensitive biological resources, monitor ongoing work, and maintain communications with the project's engineer to ensure that issues relating to coastal California gnatcatcher (Polioptila californica californica), least Bell's vireo (Vireo bellii pusillus), and their habitat are appropriately and lawfully managed.

  The qualified biological monitor shall also be responsible for the following duties:

  1. Oversee installation of and inspect temporary fencing and erosion control measures within or up-slope of avoided and/or preserved areas a minimum of once per week during installation and daily during all rain events until established to ensure that any breaks in the fence or erosion control measures are repaired immediately.
  2. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.
  3. Halt work, if necessary, and confer with the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and City of Oceanside (City) to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to USFWS, CDFW, and the City within 24 hours of its occurrence.
  4. Submit weekly letter reports (including photographs of impact areas) via email to the City during clearing/grubbing of potential habitat and/or project construction resulting in ground disturbance within 500 feet of avoided potential habitat. The weekly reports shall document that authorized impacts were not exceeded and general compliance with all conditions. The reports shall also

outline the duration of monitoring, the location of construction activities, the type of construction that occurred, and equipment used. These reports shall specify numbers and locations of any coastal California gnatcatchers/least Bell's vireo and nests, sex, observed behavior (especially in relation to construction activities), and remedial measures employed to avoid, minimize, and mitigate impacts to coastal California gnatcatchers/least Bell's vireo and nests.

5. Submit a final report to the City within 60 days of project completion that includes the following: (1) as-built construction drawings for grading with an overlay of any active nests; (2)photographs of habitat areas during pre-construction and post-construction conditions; and (3) other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with the avoidance/minimization provisions and monitoring program as required by USFWS and CDFW were achieved.

- MM-BIO-8 Breeding Season Avoidance**.** The removal of vegetation from the project impact footprint shall occur only during September 1 through February 14 to avoid the bird breeding season. Further, to the maximum extent practicable, grading activities associated with construction of the project shall occur September 1 through February 14 to avoid the breeding season. If project construction must occur during the breeding season, ~~MM BIO 8 and~~ MM-BIO-9 shall be implemented.

- MM-BIO-9 ~~General~~ Pre-construction Surveys**.** ~~Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season.~~

  General Pre-construction Survey. Within 72 hours of Project related activities, a qualified biologist with the appropriate handling permits shall conduct a survey to determine the presence of potential rare, listed, or other special status wildlife species. The qualified biologist shall survey the proposed impact areas and a 50-foot buffer. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, or in loose soil. Should a special-status species be located in the Project site during pre-activity surveys all individuals shall be documented and locations of presence recorded. If a special-status species is found, the qualified biologist shall contact the Wildlife Agencies, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall obtain all appropriate permits and prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The list (or plan) of protocols shall be implemented during Project construction and activities/biological construction monitoring.

  Nesting Bird Survey. To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat will occur outside of the breeding season (February 15 to August 31). Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a City of Oceanside (City)-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 300 feet of the construction area, and federally- or State-listed birds and raptors on or within 500 feet of the construction area. The pre-construction survey must be conducted within ~~10~~3 calendar days prior to the start of construction, the results of which must be submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected by the City-approved biologist, the following buffers shall be established: (1) no work within 300 feet of a non-listed nesting migratory bird

nest, and (2) no work within 500 feet of a listed bird or raptor nest. However, the City may reduce these buffer widths depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant will contact the City and Wildlife Agencies to determine the appropriate buffer.

Crotch's Bumble Bee Pre-Construction Survey. A pre-construction survey for Crotch's bumble bee shall be conducted within the construction footprint prior to the start of ground-disturbing construction activities occurring during the Crotch's bumble bee nesting period (February 1 through October 31). The survey shall ensure that no nests for Crotch's bumble bee are located within the construction area. The pre-construction survey shall include a habitat assessment and focused surveys, both of which shall be based on recommendations described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current version at the time of construction.

The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat on site, including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and human-made structures that may support bumble bee colonies such as rock walls, rubble, and furniture. The habitat assessment shall be repeated prior to February 1 in each year ground-disturbing activities occur to determine if nesting resources are present within the on-site and/or off-site impact areas. If nesting resources are present in the on-site and/or off-site impact areas, focused surveys shall be conducted.

The focused survey shall be performed by a biologist with expertise in surveying for bumble bees and include at least three survey passes that are not on sequential days or in the same week, preferably spaced 2 to 4 weeks apart. The timing of these surveys shall coincide with the colony active period (April 1 through August 31 for Crotch's bumble bee). Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling), and surveyors shall wait at least 1 hour following rain. Optimal surveys are when there are sunny to partly sunny skies and a temperature greater than 60°F. Surveys may be conducted earlier if other bees or butterflies are flying. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 miles per hour). Within non-developed habitats, the biologist shall look for nest resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the biologist shall watch the nest resources for up to 5 minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after 5 minutes of observation. If a bumble bee worker is detected, then a representative shall be identified to species. Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them, depending on their proximity to one another. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point to determine which would provide 100% visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes).

Identification shall include trained biologists netting/capturing the representative bumble bee in appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees. The bee shall be placed in a clear container for observation and photographic

documentation, if able. The bee shall be photographed using a macro lens from various angles to ensure recordation of key identifying characteristics. If bumble bee-identifying characteristics cannot be adequately captured in the container due to movement, the container shall be placed in a cooler with ice until the bumble bee becomes inactive (generally within 15 minutes). Once inert, the bumble bee shall be removed from the container and placed on a white sheet of paper or card for examination and photographic documentation. The bumble bee shall be released into the same area from which it was captured upon completion of identification. Based on implementation of this method on a variety of other bumble bee species, they become active shortly after removal from the cold environment, so photography must be performed quickly.

If Crotch's bumble bee nests are not detected, no further mitigation would be required. The mere presence of foraging Crotch's bumble bees would not require implementation of additional minimization measures because they can forage up to 10 kilometers from their nests. If nest resources occupied by Crotch's bumble bee are detected within the construction area, no construction activities shall occur within 100 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources shall be avoided for the duration of the Crotch's bumble bee nesting period (February 1 through October 31). Outside of the nesting season, it is assumed that no live individuals would be present within the nest because the daughter queens (gynes) usually leave by September, and all other individuals (original queen, workers, males) die. The gyne is highly mobile and can independently disperse to outside of the construction footprint to surrounding open space areas that support suitable hibernacula resources.

A written survey report shall be submitted to the City of Oceanside and CDFW within 30 days of the pre-construction survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. If Crotch's bumble bee nests are observed, the survey report shall also include recommendations for avoidance, and the location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report.

If Crotch's bumble bee is detected within the project site, the project applicant shall consult with CDFW regarding the need to obtain an Incidental Take Permit. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch's bumble bee may supersede measures provided in this document and shall be incorporated into the habitat mitigation and monitoring plan. In the event that an Incidental Take Permit is needed, mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process.

Page 34, Section 6.8.2, Subarea Plan Buffers

Of the 0.36 acres of overlapping development, 0.17 acres overlaps with Zone 2 FMZ, which will require the thinning of 0.16 acres of coastal sage scrub vegetation (the remaining 0.01 acres includes developed areas). The FMZ has been revised to include alternative compliance methods in order to eliminate the need to conduct thinning within the disturbed riparian forest and reduce impacts to the biological buffer. The slope in the northwest portion of the site is at an elevation that requires creation of a manufactured slope extending into the planning buffer. Portions

of the FMZ overlap this area, however drought-tolerant native species could be provided as part of the landscape as long as they meet the FMZ requirements. Therefore, although FMZ is not an allowed use within this buffer per the Subarea Plan, 0.17 acres of Zone 2 FMZ could still serve to provide the buffer functions established by the Subarea Plan. The project design includes a wall along the northern perimeter, and the north portion of the site's existing topographical constraints, including steep slopes, would serve as a natural deterrent to resident access and recreational use within the open space areas in the northern portion of the site. Fencing will be placed around the remaining perimeter of the development and open space interface to deter residents from recreating in the avoidance areas. In addition, the HOA shall be responsible for removing trash and prohibiting trespassing in the fenced open space area in the northern portion of the project site. ~~In addition, fencing will be placed around the perimeter of the development to deter residents from recreating in the avoidance areas.~~ The remaining impacts to the buffers are required for the proposed project to meet its overall goals and objectives. Eliminating all development within the buffers would greatly reduce the developable acreage of the site and render the proposed project infeasible from an economic standpoint.

Page 37, Figure 1: Project Location (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 39, Figure 2 Proposed Project (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Appendix D-1, Special-Status Wildlife Species Detected or Potentially Occurring within the Project Site

Scientific Name	Common Name	Status (Federal/State / Oceanside Subarea Plan)	Habitat	Potential to Occur
Invertebrates				
Bombus crotchii	Crotch's bumble bee	None/SCE/None	Open grassland and scrub communities supporting suitable floral resources.	Moderate potential to occur and forage within the study area when floral resources are available and in bloom. The non-native grassland onsite is maintained and is not likely to support the species. The coastal sage scrub may provide habitat. The closest known occurrence is located 5.5 miles south of the project near Lake Calavera (CDFW 2025).

3.22 Edits made to Appendix D, Cultural Resources Technical Report

Page 1

The Project area consists of an approximately 16.78-acre property covering one parcel (APN 157-412-15-00) located at 2839 Guajome Lake Road, improvements to Guajome Lake Road along the project frontage toward Albright Street, approximately 1,200 linear feet, and up to 2,000 feet of 3-inch sewer force main within Guajome Lake Road (Figure 2).

Page 2, Section 1 Project Description and Location

The proposed Project would involve a request for approval of a Development Plan, Tentative Map, and Density Bonus to allow for the construction of 83 single-family homes on approximately 12.45 acres of the 16.78-acre project site. The Project is subject to State Density Bonus Law (Government Code Section 65915) and local Density Bonus provisions (Section 3032 of the Zoning Ordinance). The Project area consists of an approximately 16.78-acre property covering one parcel (APN 157-412-15-00) improvements to Guajome Lake Road along the project frontage toward Albright Street, approximately 1,200 linear feet, and up to 2,000 feet of 3-inch sewer force main within Guajome Lake Road (Figure 2).

Page 13, Figure 1: Project Location (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 14, Figure 2: Project Area Map (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

3.23 Edits made to Appendix F, Paleontological Resources Inventory Report

Page 1

The project proposeds the construction of 83 single-family homes on approximately ~~12.45~~9.86 acres of the approximately 16.78-acre project site and preservation of approximately 6.92 acres in the northern portion of the site. The project would also include approximately ~~34,391~~35,151 square feet of private recreational~~ly~~ and amenity area ~~place throughout the development~~ within the development, improvements to Guajome Lake Road along the project frontage toward Albright Street, approximately 1,200 linear feet, and up to 2,000 feet of 3-inch sewer force main within Guajome Lake Road.

To determine the paleontological sensitivity of the project site, Dudek performed a paleontological resources inventory and preconstruction survey for the project to comply with the California Environmental Quality Act (CEQA) and County of San Diego's Guidelines. The inventory consisted of a field survey, a Natural History Museum of San Diego (SDNHM) paleontological records search, and a review of geological mapping and geological and paleontological literature. The results of the paleontological records search were negative for paleontological resources within the project site and areas proposed to support off-site improvements; however, the SDNHM reported four fossil localities near the project site, but they are from geological units that do not underly the project site.

Page 1, Section 1 Paleontological Resources

Paleontological resources are the remains or traces of plants and animals that are preserved in Earth's crust, and per the Society of Vertebrate Paleontology ([SVP] 2010) guidelines, are older than written history or older than approximately 5,~~5~~000 years.

Page 4, Section 4.1 Geological Map Review, Paleontological Survey, Literature Review, and Paleontological Record Search

According to the published geological mapping at a scale of 1:100,000 by Kennedy et al. (2007) and the chronostratigraphic chart (Cohen et al. 202~~2~~4), the majority of project site is underlain by middle Eocene-age (approximately 49 ~~million years ago [~~mya~~]~~ – 40 mya) Eocene deposits (the Santiago Formation - map unit Tsa) [Figure 2 – Geological Map]. Holocene (< 11,700 years ago) alluvial flood plain deposits (map unit Qya) from a tributary of the San Luis Rey River underlies the north side of the project site (Figure 2).

Page 6, References

Cohen, K.M., S.C. Finney, P.L. Gibbard, and J.X. Fan. 2024. "The ICS International Chronostratigraphic Chart." *Episodes* 36: 199–204. International Commission on Stratigraphy. Last updated 2024. https://stratigraphy.org/ICSchart/ChronostratChart2024-12.pdf.

Page 8, Figure 1: Project Location (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 9, Figure 2: Geological Map (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

3.24 Edits made to Appendix J, Noise Technical Report

Page 3, Figure 1: Project Location (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 24, Section 5 Impact Discussion

Table 5 summarizes these two distances to the apparent closest noise-sensitive receptor for each of the five sequential construction phases. Of note, construction activity associated with proposed installation of up to 2,000 feet of 3-inch sewer force main within Guajome Lake Road and improvements to Guajome Lake Road along the project frontage toward Albright Street, approximately 1,200 linear feet, is included within the building construction phase and the paving phase, respectively. At the construction site boundary, this analysis assumes that up to only one piece of equipment of each listed type per phase will be involved in the construction activity for a limited portion of the 8-hour period. In other words, at such proximity, the operating equipment cannot "stack" or crowd the vicinity and still operate. For the acoustical centroid case, which intends to be a geographic average position for all equipment during the indicated phase, this analysis assumes that the equipment may be operating up to all 8 hours per day.

Table 5. Estimated Distances between Construction Activities and the Nearest Noise-Sensitive Receptors

Construction Phase (and Equipment Types Involved)	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (feet)	Distance from Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (feet)
Site preparation (dozer, backhoe)	40	200
Grading (excavator, grader, dozer, scraper backhoe)	40	200
Building construction (crane, man-lift, generator, backhoe, welder)	~~40~~25	200
Paving (paver, roller, concrete mixer truck)	~~40~~15	200
Architectural coating (compressor)	40	200

Page 25, Section 5 Impact Discussion

Table 6. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Site preparation (dozer, backhoe)	73.7	67.4
Grading (excavator, grader, dozer, scraper backhoe)	79.9	70.1
Building construction (crane, man-lift, generator, backhoe, welder)	~~72.5~~76.0	65.2
Paving (paver, roller, concrete mixer truck)	~~70.8~~77.9	63.6
Architectural coating (compressor)	68.3	58.1

Page 27, Section 5, Impact Discussion

Stationary Noise Sources

The incorporation of new single-family homes and a mix of open space uses attributed to development of the proposed project would add a variety of noise-producing electromechanical equipment. Most of the noise-producing equipment or sound sources would be considered stationary, or limited in mobility to a defined area. Using a Microsoft Excel-based outdoor sound propagation prediction model, project-attributed operational noise at nearby community receptors was predicted using several assumptions:

- Treatment of exposed at-grade air-cooled condensing units as point-type sound emission sources
- Point-source sound propagation (i.e., 6 dB per doubling distance) that conservatively ignores acoustical absorption from atmospheric and ground surface effects

The private sewer lift station pump would be powered by a fairly small 8 horsepower (hp) motor and would be submerged in a wet well approximately 13 feet below ground surface. Under such conditions, noise levels from the operation of a sewer lift station would have negligible effects to existing noise-sensitive residential receptors; thus, operation of the private sewer lift station was not included in the outdoor sound propagation prediction model.

Appendix B, Construction Noise Modeling Inputs and Outputs (see Attachment C, Revised Appendix B, Construction Noise Modeling Inputs and Outputs, of Appendix J, Noise Technical Report, of this Final EIR)

3.25 Edits made to Appendix O, Fire Protection Plan Letter Report

Please note that the project formerly referred to as Guajome Crest is now named Guajome Lake Homes. All references to "Guajome Crest" throughout this document should be understood to refer to "Guajome Lake Homes."

Page 2, Section 1.1 Project Description

The project site has a General Plan designation of Residential with a consistent zoning designation of Single Family Detached (SFD-R). Areas surrounding the project site are zoned residential (north, east, and west of the project site) and open space zones (south of the project site. The proposed project requires for the Project to include a Development Plan, Tentative Map, and request for Density Bonus with waivers for development standards such as net lot area, lot width, and front, side, and rear yard setbacks. The project proposed a single-family residential development project which would include ~~84~~83 single-family units on the 16.78-acre project site (Figure 2, Conceptual Site Plan). The proposed single-family residential units would range from 2,096 square feet to 2,609 square feet. All homes would be developed on the southern portion of the project site which has been previously disturbed and graded. The project may be required to clear part or all of the Coastal Sage Scrub to provide a fuel modification zone for fire requirements. This will be addressed in the EIR. The project would avoid the northernmost portion of the project site along the riparian corridor, preserving approximately ~~five~~ seven acres of the 16.78-acre project site as open space. In existing conditions, the project site is mostly vacant and previously disturbed, with one existing residential house in the northern portion of the property. Access is proposed via two driveways from Guajome Lake Road along the southern boundary of the Project site, which also provides adequate emergency access to and from the development. Road improvements would include 40-foot curb to curb improvements including a five and half--foot parkway and a four and a half-foot sidewalk. The internal private road would be 28 to 32 feet wide with five-foot sidewalks. Each proposed home would include a 2-car garage, and a private driveway that would allow for additional parking of 2 more cars. All fire access roads will be designed and maintained to support the imposed loads of fire apparatus (not less than 75,000 lbs.) and be consistent with code requirements for asphaltic pavement surface. The project would also include supporting amenities, including a recreational area, open space and landscaping.

The project proposes a total of 84~~3~~ single-family residences, ~~nine (9)~~ four (4) of which would be at the affordable/low-income level (~~1~~5 percent of the total). The remaining homes would be designated as market rate. The proposed affordable homes would be proportional to the overall project in unit size, be dispersed throughout the project, and have access to all the amenities available to market rate units.

A total of approximately ~~8.4~~6.92 acres of ~~common~~ open space is proposed~~, which includes landscaping throughout the project site~~. Each residence would include private open space in the form of front and rear yards. The project

proposes approximately ~~414~~423 square-feet of open space per residence in addition to the private open space provided for each lot.

Page 8, Section 2.1 Location

In general, the Project area includes the development of ~~84~~83 single-family residential lots with homes ranging in size from ~~2,096~~1,869 square feet to ~~2,609~~ 2,220 square feet, and supporting amenities, including a recreational area, open space and landscaping.

Page 14, Section 3.1 Water Supply

The pressures in Guajome Crest will remain above 20 psi for a minimum duration of two hours when meeting the fire requirements for the City's water service area and OFD fire flows. ~~The approved, permanent~~

Page 14, Section 3.2.1 Access Roads

A proposed 30-foot-wide private drive easement (24-foot-wide pavement) will provide all-weather access to the ~~common equestrian areas~~ supporting amenities areas and the public water and sewer utilities areas. A full-width-cul-de-sac bulb will be constructed at the northern end of the access road to accommodate ~~horse trailers,~~ delivery trucks, and emergency vehicles that will need to turn around in this location.

Page 20, Section 3.7 Fire Response

Table 1. Fire Station Travel Time Response to Guajome Crest Project Site

Call Response Times to Guajome Crest	Estimated Percent of North River Farms Achievable		
	Fire Station 6	Fire Station 5	Fire Station 8
Less than 5 minutes	5%	0%	0%
5 to 6 minutes	90%	0%	0%
6 to 7 minutes	100%	10%	0%
7 to 8 minutes	100%	100%	0%
8 to 10 minutes	100%	100%	0%
Over 10 minutes	100%	100%	100%

Based on this modeling, the project would exceed the 5-minute response time goal for most of the Project area, however, would not substantially exceed the goal anywhere on the Project.

The Project proposes the development of ~~84~~83 single family residential lots, which would generate a population of approximately 240 residents, calculated based on a per household occupancy of 2.86 (U.S. Census Bureau 2021).

Page 21, Section 3.7.1.1 Emergency Response

Because Station 6 is only incrementally beyond the five-minute response goal, it would not be justified to build a new station just to serve the Guajome Crest Project. Further, requiring the Project to fund a new fire station would not be feasible based on the small number of units that would be contributing toward the station's initial costs and

ongoing operation costs. ~~Final decision regarding the need for mitigation for not strictly complying with the OFD's response time would be at OFD's discretion~~

Page 23 through 25, Section 3.11 Defensible Space

- **Section 3.11.2 Specific Guajome Crest Fuel Modification Zones**

The Project site will have ~~two~~ three fuel modification zones that extends across the Project site, as depicted in Figure 4. This defensible space consists of a combination of an irrigated, well-maintained landscape that consists of fire-resistant plants within 30 feet of the building (Zone 1) and a thinned landscape in the areas between 30 and 100 feet (Zone 2) from the structures (where applicable). The following are requirements of Fuel Modification Zones 0, 1, and 2:

1. Zone 0 Immediate Zone (0 feet to 5 feet) - This is the area located from the exterior wall surface of a building extending 5 feet on a horizontal plane to Zone 1. This zone shall be constructed of continuous hardscape or limited fire-resistant plantings acceptable to the Fire Authority Having Jurisdiction (FAHJ). Vegetation in this zone shall not exceed 6-inches in height and irrigation is required. Removal of combustible materials surrounding the exterior wall area and maintaining area free of combustible materials. The use of mulch and other combustible materials shall be prohibited.

- 2. The area (Zone 1) within 30 feet of a building or structure shall be cleared of vegetation that is not fire resistant and re-planted with fire-resistant plants. In the area between 30–100 feet (Zone 2) from a building (where applicable), all dead and dying vegetation shall be removed. Native vegetation may remain in this area provided that the vegetation is modified so that combustible vegetation does not occupy more than 50% of the square footage of this area. Weeds and annual grasses shall be maintained at a height not to exceed 4 inches. The chips from chipping of vegetation that is completed on-site may remain if the chips are dispersed so they do not exceed 6 inches in depth. Trees may remain in both areas provided that the horizontal distance between crowns of adjacent trees and crowns of trees and structures is not less than 10 feet. Mature trees shall be trimmed to a height of six feet above the ground or surrounding vegetation.
- 3. When a building or structure in a hazardous fire area is setback less than 100 feet from the property line, the person owning or occupying the building or structure shall meet the requirements in subsection (1) above, to the extent possible, in the area between the building or structure and the property line.
- 4. The building official and OFD may provide lists of prohibited and recommended plants. This FPP includes the San Diego County's Acceptable and Prohibited Plant list that will be used to inform the low-fuel and fire resistant plant species that will be incorporated into each individual lot's and the overall development's landscape plan sets that will be reviewed and approved by the OFD and City Planners prior to planting (Attachment D).
- 5.The Guajome Crest Project is surrounded by native and non-native shrubs and chaparral intermixed within an arroyo willow riparian forest to the north, larger single-family properties directly to the west and east, an extension of the Guajome Regional Park to the south, and existing single-family residential communities farther to the north, south, east and west. The FMZ widths provided for the project vary, depending on the location within the project and the off-site adjacent landscape. For example, most of the off-site areas include larger residential lots, roadways, or other disturbances that have reduced the fuels and are maintained, thus providing an equivalent FMZ.
- 6. The FMZs proposed for portions of this project are not standard OFD widths as some areas include reduced Zone 1 and/or Zone 2 areas and are less than 100 total feet within the property borders. These reductions are related to grading extents, portions of the fuel modifications zones extending in riparian forest protected areas, residential lot lines, or property boundaries that restrict Zone 1 and/or Zone 2.

Figure 4 illustrates the FMZ extents and Table 3 summarizes the breakdown for FMZs for the perimeter lots. The adequacy of the provided FMZ widths is based on a variety of analysis criteria including predicted flame length, fire intensity (BTUs) and duration, site topography, extreme weather, position of structures on pads, position of roadways, adjacent fuels, and type of construction.

- Section 3.11.3 Landscaping Requirements

  The following requirements are provided for FMZs. These zones are presented graphically in Figure 4. Plants used in the fuel modification areas or landscapes will include drought-tolerant, fire resistive trees, shrubs, and groundcovers. Suggested and prohibited landscape plants are provided in this FPP Letter Report (Attachment D). The intent of the plant list is to provide examples of plants that are less prone to ignite or spread flames to other vegetation and structures during a wildfire. The addition of plant material to the approved list will be at the discretion of OFD. Landscape plans shall be in accordance with the following criteria:

  1. Throughout the entire project site, all fire resistive trees (i.e., trees listed on the approved in the Acceptable Plant List – Attachment D) shall be planted and maintained at a minimum of 10 feet from the tree's drip line to any combustible structure. All non-fire resistive tree species, including conifers, pepper trees, eucalyptus, and acacia species shall be planted and maintained so that the tree's drip line at maturity is a minimum 30 feet from any combustible structure. Additionally, palm trees (*Phoenix* spp. and *Washingtonia* spp.) that have fibrous tissue or leaf stem bases along the trunk shall be planted and maintained no closer than 30 feet from the tree's drip line to any combustible structure. Front yard trees may be planted if they are from the approved City plant list.
  2. For streetscape plantings, Fire resistive trees can be planted 10 feet from edge of curb to center of tree trunk as long as there is sufficient setback (a minimum of 15 feet to allow for canopy growth) to adjacent structures or closer if a narrow canopy tree species is selected. Care should be given to the type of tree selected, that it will not encroach into the roadway, or produce a closed canopy effect.
  3. Limit planting of large unbroken masses of trees and large shrubs. Groupings should be two to three trees maximum, with mature foliage of any group separated horizontally by at least 10 feet, if planted on less than 20% slope, and 20 feet, if planted on greater than 20% slope.
  4. If shrubs are located underneath a tree's drip line, the lowest branch should be at least three times as high as the understory shrubs or 10 feet, whichever is greater.
  5. All tree branches and palm fronds shall be removed within 10 feet of a fireplace chimney or outdoor barbecue.

Page 25 through 26, Section 3.13 Undesirable Plants

- Certain plants are considered to be undesirable in the landscape due to characteristics that make them highly flammable. These characteristics can be physical (structure promotes ignition or combustion) or chemical (volatile chemicals increase flammability or combustion characteristics). The plants included in the Acceptable and Prohibited ~~Undesirable~~ Plant List (Attachment D) are unacceptable from a fire safety standpoint, and will not be planted on the site or allowed to establish opportunistically within fuel modification zones or landscaped areas.

Page 26, Section 3.14 Fuel Modification Area Maintenance

- All fuel modification area vegetation management shall occur on an annual basis no later than June 1 each year or more often as-needed for fire safety, compliance with the FMZ requirements detailed in this report, and as determined by the OFD. The Project Homeowners Association (HOA) shall be responsible for all vegetation management within the common areas and Zone 2 throughout the project site, in compliance with the requirements detailed herein and OFD requirements. The HOA shall be responsible for ensuring long-term funding and ongoing compliance with all provisions of this report. ~~The homeowners are~~ Each individual lot owner is responsible for ongoing Zone 0 and Zone 1 maintenance requirements in their front and rear yards, extending from the structure to the rear property line or wall/fence. All homeowners will sign acknowledgement of maintenance requirements, and the HOA will include language in the CC&R's outlining these restrictions.

  The Guajome Crest HOA Fuel Modification requirements:

  - All maintenance of access roads/driveways.
  - Annual Maintenance of FMZs including Zone 2 areas around the perimeter of the lots (or as needed).
  - Maintenance of all common areas, including trees planted along driveway/interior roadways and in other areas throughout project

  Individual Lot owners Fuel Modification requirements:

  - All maintenance of FMZs within front and rear yard areas.

  The HOA will be responsible for ~~enforcing the~~ ensuring that community-wide landscape maintenance complies annually and will retain a qualified WUI FMZ inspector who will assess the FMZs, as well as preparing a report for submittal to the OFD. ~~All fuel modification area vegetation management shall be completed annually no later than June 1st of each year and more often as needed for fire safety, as determined by the OFD.~~ The OFD will conduct annual inspections within the community to determine fuel modification zone and defensible space compliance. If the FMZs are not compliant, the HOA and/or individual lot owners will receive a notice of violation and have a specified period of time to correct any noted issues so that a re-inspection can occur and certification can be achieved. Annual inspection fees are subject to the current Fire Department Fee schedule.

Page 28, Figure 4: Fuel Modification Plan (see Attachment A, Figure Revisions to the Draft EIR, of this Final EIR)

Page 33, Section 3.16.3 Fire Behavior Modeling Results

Therefore, the FMZs proposed for this project are approximately 2.5-times the flame length of the worst-case fire scenario under peak weather conditions and would provide adequate defensible space were there to be a wildfire approaching the perimeter of the project site by creating an area of reduced vegetation, thus slowing down the spread of a wildfire ~~to augment a wildfire approaching the perimeter of the Project site~~.

Page 40, Section 4.1 Additional Structure Protection Measures and Justification

2. Each of the new single-family residential structures within the proposed Project site will be code compliant, ignition resistive, and fully-sprinklered in compliance with applicable portions of the City of Oceanside Municipal Code, as well as with the 2019 edition of the California Building Code (CBC), Chapter 7A (or then current edition); 2019 edition of the California Fire Code (CFC), Chapter 49 (or then current edition); and 2019 edition of the California Residential Code (CRC), Section ~~237~~337 (or then current edition), as adopted by the City;

Page 46, Section 5 Emergency Pre-Planning – Evacuation and Wildfire Education Program

Early evacuation for any type of wildfire emergency at the Project site is the preferred method of providing for resident safety, consistent with the OFD's current approach within San Diego County. As such, the Project would formally adopt, practice, and implement a "Ready, Set, Go!" approach to evacuation. The "Ready, Set, Go!" concept is widely known and encouraged by the State of California and most fire agencies. Pre-planning for emergencies, including wildfire emergencies, focuses on being prepared, having a well-defined plan, minimizing the potential for errors, maintaining the Project site's fire protection systems, and implementing a conservative (evacuate as early as possible) approach to evacuation and Project area activities during periods of fire weather extremes. The HOA will provide the community with an active homeowner educational outreach on its Webpage, at community meetings, and with strategically timed reminders regarding their responsibilities for maintaining their homes, checklists to complete if a wildfire occurs, and general fire awareness and readiness. These wildfire education outreach recommendations would follow the Ready, Set, Go! wildfire ready approach.

Based on the developed landscapes throughout the area and lack of wildlands, Project-provided road enhancements/widening of the existing dirt-road Guajome Lake Road, additional fire hydrants provided throughout the Project site, and minimal overall Project size and limited number of new residents and vehicles to the area, the reduced fuel modification zones is considered satisfactorily addressed, and the Project is considered to meet the intent of the code.

Attachment D (see Attachment D of this Final EIR for Revised Attachment D, Prohibited Plant List, of Appendix O, Fire Protection Plan Letter Report)

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4 Mitigation Monitoring and Reporting Program

Section 15097 of the California Environmental Quality Act (CEQA) guidelines requires that, upon certification of an Environmental Impact Report or a Mitigated Negative Declaration, "the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects."

This Mitigation Monitoring and Reporting Program has been developed in compliance with Section 21081.6 of the California Public Resources Code and Section 15097 of the California Environmental Quality Act Guidelines, and includes the following information:

- A list of mitigation measures
- The timing for implementation of the mitigation measures
- The party responsible for implementing or monitoring the mitigation measures

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
Air Quality		
AQ-1: Require Low-Volatile Organic Compound Coatings During Construction The project applicant and/or their contractors shall ensure that low-volatile organic compound (VOC) coatings with a VOC content of 50 grams per liter or less are used during construction.	During construction	Project applicant
AQ-2: Wood Burning Stoves and Fireplaces No wood burning stoves or fireplaces shall be constructed as part of the project.	Prior to and during construction	Project applicant
Biological Resources		
BIO-1: Off-Site Mitigation Credits In order to mitigate for the loss of 1.25 acres of coastal sage scrub and 8.29 acres of non-native grassland, 2.5 acres of coastal sage scrub and 4.14 acres of non-native grassland are required. The project applicant will create 6.64 acres of coastal sage scrub at the Quarry Creek mitigation site.	Prior to, during, and following construction	Project applicant
BIO-2: Landscaping The applicant shall ensure that development landscaping adjacent to on- or off-site habitat does not include exotic plant species that may be invasive to native habitats. Exotic plant species not to be used include any species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" List. This list includes such species as pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained from Cal-IPC's web site or other similar sources that may evolve over the life of this plan. In addition, landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to the Preserve and water runoff from landscaped areas should be directed away from the open space areas and contained and/or treated within the development footprint. Landscaping within the Subarea Plan buffers will consist of native species. The applicant shall ensure that development lighting adjacent to all on- or off-site habitat shall be directed away from and/or shielded so as not to illuminate native habitats.	Prior to and during construction	Project applicant
BIO-3: Temporary Installation Fencing The project applicant shall temporarily fence (with silt barriers) the limits of project impacts (including construction staging areas and access routes) to prevent additional habitat impacts	Prior to and during construction, and upon project completion	Project applicant

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
and prevent the spread of silt from the construction zone into adjacent native habitats to be preserved. Fencing shall be installed in a manner that does not impact habitats to be preserved. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the Wildlife Agencies. Any riparian/wetland or upland habitat impacts that occur beyond the approved fenced shall be mitigated at a minimum 5:1 ratio. Temporary construction fencing shall be removed upon project completion.		
BIO-4: Environmental Awareness Training A Workers Environmental Awareness Training Program shall be implemented with the contractor and all active construction personnel prior to construction to ensure knowledge of sensitive wildlife that may occur on site, including coastal California gnatcatcher (*Polioptila californica californica*) and least Bell's vireo (*Vireo bellii pusillus*) and their habitat, and general compliance with environmental/permit regulations and mitigation measures. At a minimum, training shall include a discussion of the following topics: (1) the purpose for resource protection; (2) descriptions of coastal California gnatcatcher and least Bell's vireo and their habitat; (3) the mitigation measures outlined in this report that should be implemented during Project construction to conserve sensitive resources, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced area to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps and on the Project site by fencing); (4) environmentally responsible construction practices; (5) the protocol to resolve conflicts that may arise at any time during the construction process; and, (6) the general provisions of the federal Endangered Species Act (FESA), the need to adhere to the provisions of FESA, and the penalties associated with violating FESA.	Prior to construction	Project applicant
BIO-5: Work Hours Project construction shall occur during daylight hours. However, if temporary night work is required, night lighting shall be of the lowest illumination necessary for human safety, selectively placed, shielded, and directed away from natural habitats.	During construction	Project applicant and City of Oceanside
BIO-6: Construction Best Management Practices The Project applicant shall ensure that the following conditions are implemented during Project construction to minimize potential impacts to sensitive vegetation and species:	During construction	Project applicant

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
1. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint; 2. To avoid attracting predators of covered species, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site; 3. Pets of project personnel shall not be allowed on the project site; 4. Disposal or temporary placement of excess fill, brush or other debris shall not be allowed in waters of the United States or their banks; 5. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas outside of waters of the United States within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering waters of the United States, and shall be shown on the construction plans. Fueling of equipment shall take place within existing paved areas greater than 100 feet from waters of the United States. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. “No-fueling zones” shall be designated on construction plans. 6. Impacts from fugitive dust shall be avoided and minimized through watering and other appropriate measures consistent with the Construction General Permit Order 2009-009-DWQ.		
BIO-7: Biological Monitor Requirements and Duties A qualified biologist shall be on site daily during initial clearing/grubbing and weekly during grading activities within 500 feet of preserved habitat to ensure compliance with all project-imposed mitigation measures. The biologist shall be available during pre-construction and construction phases to review grading plans, address protection of sensitive biological resources, monitor ongoing work, and maintain communications with the project’s engineer to ensure that issues relating to coastal California gnatcatcher (Polioptila californica californica), least Bell’s vireo (Vireo bellii pusillus), and their habitat are appropriately and lawfully managed. The qualified biological monitor shall also be responsible for the following duties:	Prior to and during construction	City of Oceanside, USFWS, and CDFW

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
1. Oversee installation of and inspect temporary fencing and erosion control measures within or up-slope of avoided and/or preserved areas a minimum of once per week during installation and daily during all rain events until established to ensure that any breaks in the fence or erosion control measures are repaired immediately. 2. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust. 3. Halt work, if necessary, and confer with the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and City of Oceanside (City) to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to USFWS, CDFW, and the City within 24 hours of its occurrence. 4. Submit weekly letter reports (including photographs of impact areas) via email to the City during clearing/grubbing of potential habitat and/or project construction resulting in ground disturbance within 500 feet of avoided potential habitat. The weekly reports shall document that authorized impacts were not exceeded and general compliance with all conditions. The reports shall also outline the duration of monitoring, the location of construction activities, the type of construction that occurred, and equipment used. These reports shall specify numbers and locations of any coastal California gnatcatchers/least Bell's vireo and nests, sex, observed behavior (especially in relation to construction activities), and remedial measures employed to avoid, minimize, and mitigate impacts to coastal California gnatcatchers/least Bell's vireo and nests. 5. Submit a final report to the City within 60 days of project completion that includes the following: (1) as-built construction drawings for grading with an overlay of any active nests; (2)photographs of habitat areas during pre-construction and post-construction conditions; and (3) other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with the avoidance/minimization provisions and monitoring program as required by USFWS and CDFW were achieved.		
BIO-8: Breeding Season Avoidance The removal of vegetation from the project impact footprint shall occur only during September 1 through February 14 to avoid the bird breeding season. Further, to the maximum extent practicable, grading activities associated with construction of the project shall occur September 1 through February 14 to avoid the breeding season. If project construction must occur during the breeding season, MM-BIO-9 shall be implemented.	Prior to and during construction	City of Oceanside

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
BIO-9: Pre-Construction Surveys **General Pre-construction Survey.** Within 72 hours of Project related activities, a qualified biologist with the appropriate handling permits shall conduct a survey to determine the presence of potential rare, listed, or other special status wildlife species. The qualified biologist shall survey the proposed impact areas and a 50-foot buffer. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, or in loose soil. Should a special-status species be located in the Project site during pre-activity surveys all individuals shall be documented and locations of presence recorded. If a special-status species is found, the qualified biologist shall contact the Wildlife Agencies, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall obtain all appropriate permits and prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The list (or plan) of protocols shall be implemented during Project construction and activities/biological construction monitoring. **Nesting Bird Survey.** To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat will occur outside of the breeding season (February 15 to August 31). Take of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code shall be avoided during the nesting season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a City of Oceanside (City)-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 300 feet of the construction area, and federally- or State-listed birds and raptors on or within 500 feet of the construction area. The pre-construction survey must be conducted within 3 calendar days prior to the start of construction, the results of which must be submitted to the City for review and approval prior to initiating any construction activities. If nesting birds are detected by the City-approved biologist, the following buffers shall be established: (1) no work within 300 feet of a non-listed nesting migratory bird nest, and (2) no work within 500 feet of a listed bird or raptor nest. However, the City may reduce these buffer widths depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If	Prior to construction	City of Oceanside and CDFW

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
construction must take place within the recommended buffer widths above, the project applicant will contact the City and Wildlife Agencies to determine the appropriate buffer. Crotch's Bumble Bee Pre-Construction Survey. A pre-construction survey for Crotch's bumble bee shall be conducted within the construction footprint prior to the start of ground-disturbing construction activities occurring during the Crotch's bumble bee nesting period (February 1 through October 31). The survey shall ensure that no nests for Crotch's bumble bee are located within the construction area. The pre-construction survey shall include a habitat assessment and focused surveys, both of which shall be based on recommendations described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current version at the time of construction. The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat on site, including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and human-made structures that may support bumble bee colonies such as rock walls, rubble, and furniture. The habitat assessment shall be repeated prior to February 1 in each year ground-disturbing activities occur to determine if nesting resources are present within the on-site and/or off-site impact areas. If nesting resources are present in the on-site and/or off-site impact areas, focused surveys shall be conducted. The focused survey shall be performed by a biologist with expertise in surveying for bumble bees and include at least three survey passes that are not on sequential days or in the same week, preferably spaced 2 to 4 weeks apart. The timing of these surveys shall coincide with the colony active period (April 1 through August 31 for Crotch's bumble bee). Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling), and surveyors shall wait at least 1 hour following rain. Optimal surveys are when there are sunny to partly sunny skies and a temperature greater than 60°F. Surveys may be conducted earlier if other bees or butterflies are flying. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 miles per hour). Within non-developed habitats, the biologist shall look for nest resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the biologist shall watch the nest resources for up to 5 minutes, looking for exiting or entering worker bumble bees. Worker bees		

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
should arrive and exit an active nest site with frequency, such that their presence would be apparent after 5 minutes of observation. If a bumble bee worker is detected, then a representative shall be identified to species. Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them, depending on their proximity to one another. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point to determine which would provide 100% visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes). Identification shall include trained biologists netting/capturing the representative bumble bee in appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees. The bee shall be placed in a clear container for observation and photographic documentation, if able. The bee shall be photographed using a macro lens from various angles to ensure recordation of key identifying characteristics. If bumble bee-identifying characteristics cannot be adequately captured in the container due to movement, the container shall be placed in a cooler with ice until the bumble bee becomes inactive (generally within 15 minutes). Once inert, the bumble bee shall be removed from the container and placed on a white sheet of paper or card for examination and photographic documentation. The bumble bee shall be released into the same area from which it was captured upon completion of identification. Based on implementation of this method on a variety of other bumble bee species, they become active shortly after removal from the cold environment, so photography must be performed quickly. If Crotch's bumble bee nests are not detected, no further mitigation would be required. The mere presence of foraging Crotch's bumble bees would not require implementation of additional minimization measures because they can forage up to 10 kilometers from their nests. If nest resources occupied by Crotch's bumble bee are detected within the construction area, no construction activities shall occur within 100 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources shall be avoided for the duration of the Crotch's bumble bee nesting period (February 1 through October 31). Outside of the nesting season, it is assumed that no live individuals would be present within the nest because the daughter queens (gynes) usually leave by September, and all other individuals (original queen, workers, males) die. The gyne is highly mobile and can		

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
independently disperse to outside of the construction footprint to surrounding open space areas that support suitable hibernacula resources. A written survey report shall be submitted to the City of Oceanside and CDFW within 30 days of the pre-construction survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. If Crotch's bumble bee nests are observed, the survey report shall also include recommendations for avoidance, and the location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report. If Crotch's bumble bee is detected within the project site, the project applicant shall consult with CDFW regarding the need to obtain an Incidental Take Permit. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch's bumble bee may supersede measures provided in this document and shall be incorporated into the habitat mitigation and monitoring plan. In the event that an Incidental Take Permit is needed, mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process.		
BIO-10: California Gnatcatcher Nest Avoidance and Minimization Measures. If an active coastal California gnatcatcher (*Polioptila californica californica*) nest is found on site or within 500 feet of Project grading activities, the biologist shall postpone work within 500 feet of the nest and contact the U.S. Fish and Wildlife Service (USFWS) and the City of Oceanside to discuss (1) the best approach to avoid/minimize impacts to nesting coastal California gnatcatchers (e.g., sound walls, noise monitoring); and (2) a nest monitoring program acceptable to USFWS. Subsequent to these discussions, work may be initiated subject to implementation of the agreed-upon avoidance/minimization approach and monitoring program. If the biologist determines that bird breeding behavior is being disrupted, the Project applicant shall stop work and coordinate with USFWS to review the avoidance/minimization approach. Upon agreement as to any necessary revisions to the avoidance/minimization approach, work may resume subject to the revisions and continued monitoring. Success or failure of an active nest shall be established	During construction	City of Oceanside and USFWS

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
by regular and frequent trips to the site, as determined by the biologist and through a schedule approved by the wildlife agencies. Monitoring of an active nest shall continue until fledglings have dispersed or the nest has been determined to be a failure, as approved by USFWS.		
Cultural Resources		
CUL-1: Prior to the issuance of a Grading Permit, the Applicant/Owner shall enter into a pre-excavation agreement, otherwise known as a Tribal Cultural Resources Treatment and Tribal Monitoring Agreement with the Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Luiseño Tribe. A copy of the agreement shall be included in the Grading Plan Submittals for the Grading Permit. The purpose of this agreement shall be to formalize protocols and procedures between the Applicant/Owner and the Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Luiseño 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 tribal cultural resources, 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. Through consultation with the Tribes that consulted on the project and with their consent, certain artifacts may be made available for 3D scanning/printing, with scanned/printed materials to be curated at a local repository meeting the federal standards of 36CFR79.	Prior to construction	Project applicant
CUL-2: Prior to the issuance of a Grading Permit, the Applicant/Owner or Grading Contractor shall provide a written and signed letter to the City of Oceanside Planning Division stating that a Qualified Archaeologist and Luiseño Native American Monitor have been retained at the Applicant/Owner or Grading Contractor's expense to implement the monitoring program, as described in the pre-excavation agreement.	Prior to construction	Project applicant
CUL-3: The Qualified Archaeologist shall maintain ongoing collaborative consultation with the Luiseño Native American monitor during all ground disturbing activities. The requirement for the monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall notify the City of Oceanside Planning Division of the start and end of all ground disturbing activities.	During construction	Project applicant and City of Oceanside

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
CUL-4: The Qualified Archaeologist and Luiseño Native American Monitor shall attend all applicable pre-construction meetings with the General Contractor and/or associated Subcontractors to present the archaeological monitoring program. The Qualified Archaeologist and Luiseño Native American Monitor shall be present on-site full-time during grubbing, grading and/or other ground altering activities, including the placement of imported fill materials or fill used from other areas of the project site, to identify any evidence of potential archaeological or tribal cultural resources. All fill materials shall be absent of any and all tribal cultural resources.	Prior to construction	Project applicant
CUL-5: In order for potentially significant archaeological artifact deposits and/or cultural resources to be readily detected during mitigation monitoring, a written "Controlled Grade Procedure" for CA-SDI-5345 shall be prepared by a Qualified Archaeologist, in consultation with the other TCA Luiseño Tribes that have participated in the state-prescribed process for this project, and the Applicant/Owner, subject to the approval of City representatives. The Controlled Grade Procedure shall establish requirements for any ground disturbing work with machinery occurring in and around areas the Qualified Archaeologist and Luiseño Native American monitor determine to be sensitive through the cultural resource mitigation monitoring process. The Controlled Grade Procedure shall include, but not be limited to, appropriate operating pace, increments of removal, weight and other characteristics of the earth disturbing equipment. A copy of the Controlled Grade Procedure shall be included in the Grading Plan Submittals for the Grading Permit.	Prior to construction	Project applicant
CUL-6: The Qualified Archaeologist or the Luiseño Native American Monitor may halt ground disturbing activities if unknown Tribal Cultural Resources, or non-Tribal unique archaeological resources as defined in CEQA Guidelines section 15064.5 (artifact deposits or cultural features or artifacts) are discovered. Ground disturbing activities shall be directed away from these deposits to allow a determination of potential importance. Isolates and clearly non-significant deposits ~~will~~ shall be minimally documented in the field, and before grading proceeds these items shall be secured until they can be repatriated. If items cannot be securely stored on the project site, they may be stored in off-site facilities located in San Diego County. If the Qualified Archaeologist and Luiseño Native American monitor determine that the unearthed tribal cultural resource, or non-Tribal unique archaeological resources (artifact deposits, or cultural features or artifacts) are considered potentially significant TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the respectful and dignified treatment of those resources. The avoidance and protection of the significant tribal cultural resource and/or unique archaeological resource is the preferable mitigation. If, however, it is determined by the City that avoidance of the resource is infeasible, and it is determined that a	Prior to construction	Project applicant

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
data recovery plan is necessary by the City as the lead agency under CEQA, TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the drafting and finalization of any such recovery plan. For significant Tribal Cultural Resources, or non-Tribal unique archaeological resources (artifact deposits, or cultural features or artifacts) artifact deposits or cultural features that are part of a data recovery plan, an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods. The data recovery plan shall also incorporate and reflect the tribal values of the TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project. If the Qualified Archaeologist collects such resources, the Luiseño Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the Tribal Cultural Resources that are unearthed during the ground disturbing activities, the Luiseño Native American monitor, may at their discretion, collect said resources and provide them to the appropriate TCA Luiseño Tribe, as determined through the appropriate process, for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Ground disturbing activities shall not resume until the Qualified Archaeologist, in consultation with the Luiseño Native American Monitor, deems the cultural resource or feature has been appropriately documented and/or protected. Non-Tribal unique archaeological resource materials shall be collected and stored by the Qualified Archaeologist in offsite facilities located in San Diego County until the non-Tribal unique archaeological resources are curated at an appropriate qualified repository in San Diego County that meets federal standards per 36 CRF Part 79.		
CUL-7: The landowner shall relinquish ownership of all tribal cultural resources unearthed during the cultural resource mitigation monitoring conducted during all ground disturbing activities, and from any previous archaeological studies or excavations on the project site to the appropriate TCA Luiseño Tribe, as determined through the appropriate process, for respectful and dignified treatment and disposition, including reburial at a protected location on-site, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98. No tribal cultural resources shall be subject to curation.	Prior to and during construction	Project applicant
CUL-8: Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusions of the archaeological	Prior to construction	Project applicant and City of Oceanside

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
monitoring program (e.g., data recovery plan) shall be submitted by the Qualified Archaeologist, along with the Luiseño Native American monitor's notes and comments, to the City of Oceanside Planning Division for approval.		
CUL-9: 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 Office of the Medical Examiner by telephone. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, 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. If suspected Native American remains are discovered, the 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 Luiseño Native American monitor. By law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner identifies the remains to be of Native American ancestry, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall make a determination as to the Most Likely Descendent.	During construction	Project applicant
Geology and Soils		
GEO-1: Paleontological Resources Impact Mitigation Program and Paleontological Monitoring. Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The qualified paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project that shall be consistent with the SVP (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. The PRIMP shall also include a statement that any fossil lab or curation costs (if necessary due to fossil recovery) are the responsibility of the project proponent. A qualified paleontological monitor shall be on site during	Prior to construction	Project applicant

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring	
	Timing of Implementation	Responsible Party
initial rough grading and other significant ground-disturbing activities in areas underlain by the Santiago Formation and below a depth of five feet below the ground surface in areas underlain by Holocene alluvium to determine if they are old enough to preserve scientifically significant paleontological resources. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will allow grading to recommence in the area of the find.		

5 References and Preparers

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5.2 List of Preparers

City of Oceanside

Robert Dmohowski, Principal Planner

Dudek

Kristen Stoner – Project Manager
Katherine Waugh – Project Manager
Christopher Oesch, Project Manager/Biologist
Alexandra Howard, Environmental Analyst
Patricia Schuyler, Biologist
Erin Lucett, Environmental Analyst
Nick Lorenzen, Air Quality and Greenhouse Gas Emissions Specialist
Connor Burke, Acoustician
Sabita Tewani, Transportation Specialist
Keshia Montifolca, Archaeologist
Noah Stamm, Fire Protection Planner

Attachment A
Figure Revisions to the Draft EIR

FIGURES LISTED BELOW ARE IN SAME ORDER AS SHOWN WITHIN THIS ATTACHMENT:

DRAFT EIR CHAPTER 3, PROJECT DESCRIPTION
FIGURE 3-1: PROJECT LOCATION IN CHAPTER 3, PROJECT DESCRIPTION
FIGURE 3-2: EXISTING PROJECT SITE, IN CHAPTER 3, PROJECT DESCRIPTION
FIGURE 3-5A AND 3-5B: CONCEPTUAL LANDSCAPE PLAN, IN CHAPTER 3, PROJECT DESCRIPTION

DRAFT EIR APPENDIX B, AIR QUALITY AND GREENHOUSE GAS EMISSIONS TECHNICAL REPORT
FIGURE 1: PROJECT LOCATION, IN APPENDIX B, AIR QUALITY AND GREENHOUSE GAS EMISSIONS TECHNICAL REPORT
FIGURE 2: PROPOSED PROJECT, IN APPENDIX B, AIR QUALITY AND GREENHOUSE GAS EMISSIONS TECHNICAL REPORT

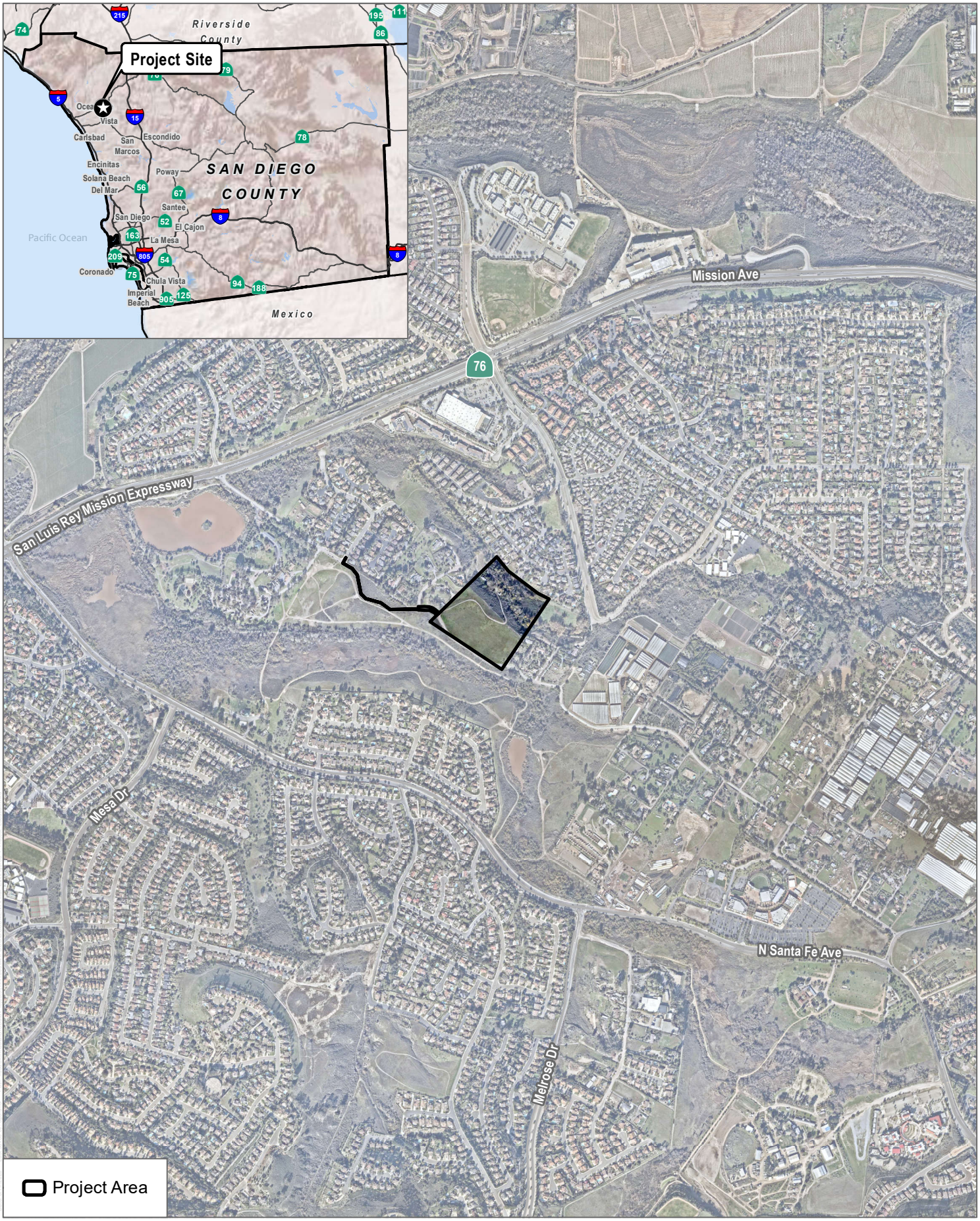
DRAFT EIR APPENDIX C, BIOLOGICAL RESOURCES TECHNICAL REPORT
FIGURE 1: PROJECT LOCATION IN APPENDIX C, BIOLOGICAL RESOURCES TECHNICAL REPORT
FIGURE 2: PROPOSED PROJECT IN APPENDIX C, BIOLOGICAL RESOURCES TECHNICAL REPORT

DRAFT EIR APPENDIX D, CULTURAL RESOURCES TECHNICAL REPORT
FIGURE 1: PROJECT LOCATION IN APPENDIX D, CULTURAL RESOURCES TECHNICAL REPORT
FIGURE 2: PROJECT AREA MAP IN APPENDIX D, CULTURAL RESOURCES TECHNICAL REPORT

DRAFT EIR APPENDIX F, PALEONTOLOGICAL RESOURCES INVENTORY REPORT
FIGURE 1: PROJECT LOCATION IN APPENDIX F, PALEONTOLOGICAL RESOURCES INVENTORY REPORT
FIGURE 2: GEOLOGICAL MAP IN APPENDIX F, PALEONTOLOGICAL RESOURCES INVENTORY REPORT

DRAFT EIR APPENDIX J, NOISE TECHNICAL REPORT
FIGURE 1: PROJECT LOCATION IN APPENDIX J, NOISE TECHNICAL REPORT

DRAFT EIR APPENDIX O FIRE PROTECTION PLAN LETTER REPORT
FIGURE 4: FUEL MODIFICATION PLAN IN APPENDIX O, FIRE PROTECTION PLAN LETTER REPORT



SOURCE: SANGIS 2020, Open Street Maps 2019

DUDEK

0 500 1,000 Feet

FIGURE 3-1

Project Location

Guajome Lake Homes Project



SOURCE: SANGIS 2020, Open Streets Map 2019

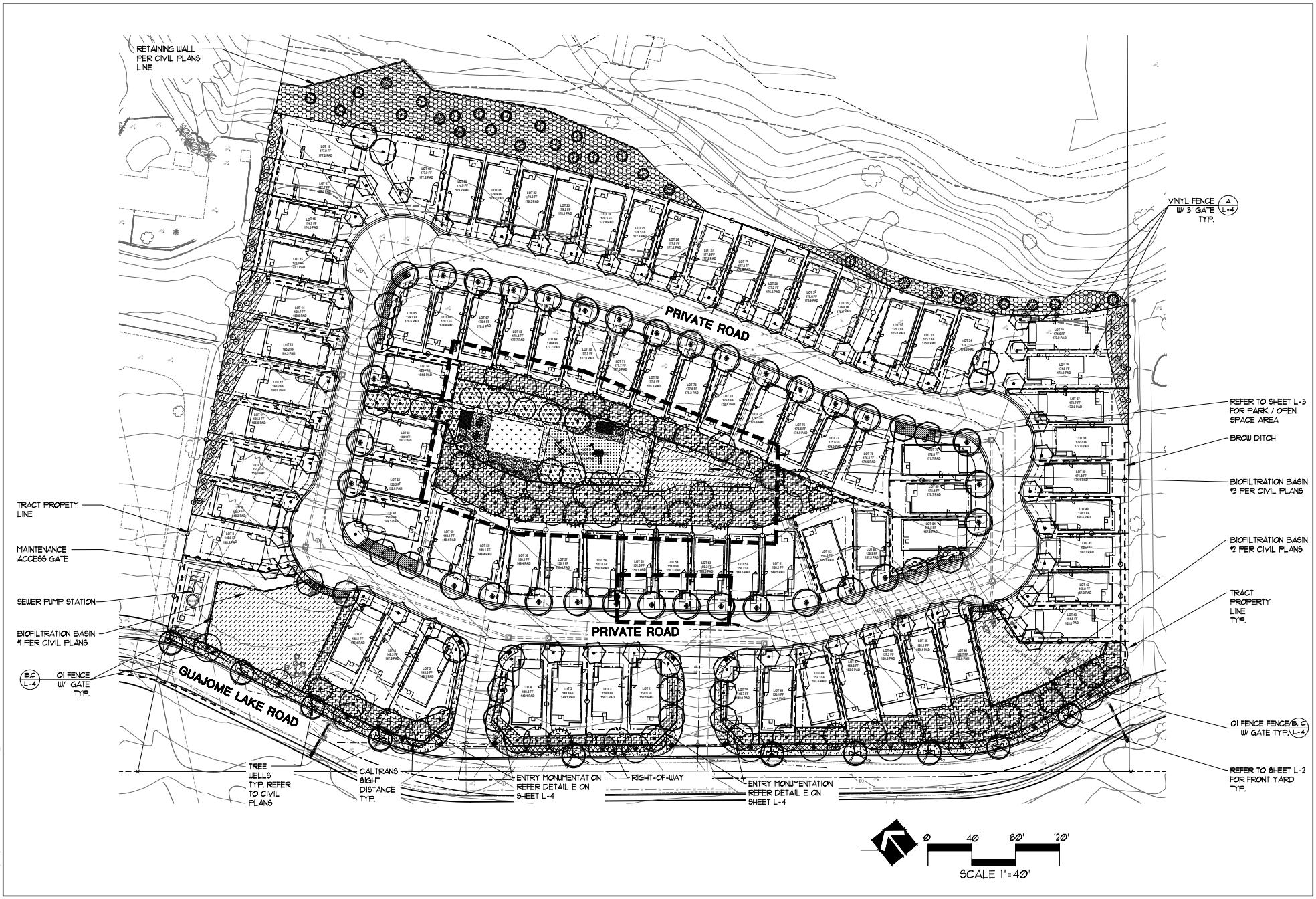
DUDEK

0 75 150 Feet

FIGURE 3-2

Existing Project Site

Guajome Lake Homes Project



SOURCE: Lightfoot Planning Group 2024

FIGURE 3-5a

Conceptual Landscape Plan

Guajome Lake Homes Project

DUDEK

Concept Plant Palette - Typical Front Yard

SYMBOL	BOTANICAL / COMMON NAME	SIZE	WUCOLS	SPACING
SHRUBS				
	AGAVE ATTENUATA / FOXTAIL AGAVE	5 GAL.	LOW	60" o.c.
	PHORMIUM X 'YELLOW WAVE' / YELLOW WAVE NEW ZEALAND FLAX	5 GAL.		60" o.c.
	YUCCA FILAMENTOSA 'COLOR GUARD' / COLOR GUARD ADAM'S NEEDLE	5 GAL.		60" o.c.
	ALOE 'MOONGLOW'/ MOONGLOW ALOE	5 GAL.		60" o.c.
	ALOE 'BLUE ELF'/ BLUE ELF ALOE	1 GAL.	LOW	36" o.c.
	DIANELLA REVOLUTA 'BABY BLISS'/ BABY BLISS FLAX LILY	1 GAL.		36" O.C.
	FESTUCA GLAUCA 'ELIJA BLUE'/ ELIJAH BLUE FESCUE	1 GAL.		36" O.C.
	ANIGOZANTHOS SPP/ KANGAROO PAW	1 GAL.		36" O.C.
	CARPENTERIA CALIFORNICA 'ELIZABETH' / ELIZABETH BUSH ANEMONE	5 GAL.	LOW	60" o.c.
	RHAMNUS CALIFORNICA 'EVE CASE'/ COFFEEBERRY	5 GAL.		60" O.C.
	LEUCOPHYLLUM FRUTESCENS 'COMPACTA'/ COMPACT TEXAS SAGE	5 GAL.		60" O.C.
	TECOMA X 'ORANGE JUBILEE'/ ORANGE JUBILEE YELLOW BELLS	5 GAL.		60" O.C.
	CISTUS X PURPUREUS / ORCHID ROCKROSE	5 GAL.	LOW	60" o.c.
	SALVIA GREGGII PURPLE/ AUTUMN SAGE	5 GAL.		60" O.C.
	DIPLACUS AURANTIACUS 'DARK PINK'/ DARK PINK MONKEYFLOWER	5 GAL.		60" O.C.
	ENCELIA CALIFORNICA/ CALIFORNIA ENCELIA	5 GAL.		60" O.C.
	HESPERALOE PARVIFLORA 'PERPA' / BRAKELIGHTS RED YUCCA	5 GAL.	LOW	36" o.c.
	ANIGOZANTHOS SPP/ KANGAROO PAW	5 GAL.		36" O.C.
	EPILOBIUM CANUM/ CALIFORNIA FUCHSIA	5 GAL.		36" O.C.
	LANTANA X 'NEW GOLD' / NEW GOLD LANTANA	1 GAL.	LOW	48" o.c.
	TEUCRIUM CHAMAEDRYS 'PROSTRATUM'/ PROSTRATE GERMANDER	1 GAL.		36" O.C.
	VERBENA LILACINA 'DE LA MINA'/ DE LA MINA LILAC VERBENA	1 GAL.		36" O.C.
	SENECIO SERPENS/ BLUE CHALKSTICKS	1 GAL.		36" O.C.
	ERIGERON GLAUCUS	1 GAL.		36" O.C.
	LOMANDRA LONGIFOLIA 'BREEZE' / BREEZE MAT RUSH	5 GAL.	LOW	48" o.c.
	BOUTELOUA GRACILIS 'BLONDE AMBITION' / BLONDE AMBITION GRAMA	5 GAL.		48" O.C.
	JUNCUS PATENS/ CALIFORNIA GRAY RUSH	5 GAL.		48" O.C.
	OLEA EUROPAEA 'MONTRA'/ LITTLE OLLIE OLIVE	5 GAL.		48" O.C.
	SALVIA GREGGII / AUTUMN SAGE	1 GAL.	LOW	36" o.c.
	PENSTEMON SPECTABILIS/ SHOWY PENSTEMON	1 GAL.		36" O.C.
	LAVANDULA SPP	1 GAL.		36" O.C.
	LUPINUS EXCUBITUS/ GRAPE SODA LUPINE	1 GAL.		36" O.C.
	DECOMPOSED GRANITE - 3" DEPTH- CALIFORNIA GOLD/ OR APPROVED EQUAL.			

Concept Plant Palette - Guajome Lake Homes Development

GUAJOME LAKE STREET TREE PROJECT TREE (MIN. SIZE 24" BOX)
CHILOPSIS LINEARIS- DESERT WILLOW
ARBUTUS X `MARINA` / ARBUTUS STANDARD
ERYOBOTRYA DEFLEXA STD. / BROZE LOQUAT
RHAPHIOLEPIS ' MAJESTIC BEAUTY' STD. /INDIAN HOWTHORN
LAURUS NOBILIS/ SWEET BAY
TRISTANIA CONFERTA(LOPHOSTEMON)/ BRISBANE BOX

TREE WELL STREET TREE PROJECT TREE (MIN. SIZE 24" BOX)
ARBUTUS X `MARINA` / ARBUTUS STANDARD
CHILOPSIS LINEARIS- DESERT WILLOW
ERYOBOTRYA DEFLEXA STD. / BROZE LOQUAT
RHAPHIOLEPIS ' MAJESTIC BEAUTY' STD. /INDIAN HOWTHORN
LAURUS NOBILIS/ SWEET BAY
TRISTANIA CONFERTA(LOPHOSTEMON)/ BRISBANE BOX

FRONT YARD TREE (MIN. SIZE 15" GAL)
ARBUTUS X `MARINA` / ARBUTUS STANDARD
ERYOBOTRYA DEFLEXA STD. / BROZE LOQUAT
RHAPHIOLEPIS ' MAJESTIC BEAUTY' STD. /INDIAN HOWTHORN
CERCIS CANADENSIS/ EASTERN REDBUD
CERCIDIUM FLORIDUM/ BLUE PALO VERDE
QUERCUS AGRIFOLIA / COAST LIVE OAK

OUTSIDE SLOPE TREE (MIN. SIZE 1,5 & 15 GAL.)
PRUNUS ILICIFOLIA / HOLLY LEAF CHERRY
QUERCUS AGRIFOLIA / COAST LIVE OAK
QUERCUS ENGLEMANNII / ENGELMANN OAK
QUERCUS WISLIZENII / INTERIOR LIVE OAK
LYONOTHAMNUS F. ASPLENIFOLIUS / CATALINA IRONWOOD
LOPHOSTEMON CONFERTUS/ BRISBANE BOXTREE

INTERIOR TREE ACCENT CANOPY (MIN. SIZE 15" GAL.)
ARBUTUS X `MARINA` / ARBUTUS STANDARD
MAGNOLIA GRANDIFLORA HYBRID / SO. MAGNOLIA HYBRID
ERYOBOTRYA DEFLEXA STD. / BROZE LOQUAT
JACARANDA MIMOSIFOLIA / JACARANDA
TABEBUIA IMPETIGINOSA / PINK TRUMPET TREE
PLATANUS RACEMOSA/ CALIFORNIA SYCAMORE
GEIJERA PARVIFLORA/ AUSTRALIAN WILLOW

SLOPE TREE (MIN. SIZE 15" GAL.)
LYONOTHAMNUS F. ASPLENIFOLIUS / CATALINA IRONWOOD
LOPHOSTEMON CONFERTUS/ BRISBANE BOXTREE
GEIJERA PARCIFLORA/ AUSTRALIAN WILLOW
ARBUTUS X `MARINA` / ARBUTUS STANDARD
QUERCUS AGRIFOLIA/ COAST LIVE OAK

PRIVATE SHRUB FOR SLOPE (MIN. SIZE 1 & 5 GAL.)
CISTUS PURPUREUS/ ORCHID ROCKROSE
PHORMIUM SPP/ NEW ZEALAND FLAX
AGAVE SPP/ AGAVE
SALVIA SPP/ SALVIA
LEUCOPHYLLUM SPP/ TEXAS SAGE

GUAJOME LAKE RD SLOPE PLANTING (MIN. SIZE FLATS, 1, 5, 15 GAL.)
AGAVE ATTENUATA/ FOXTAIL AGAVE
AGAVE SPP/ AGAVE SPECIES
LANTANA SPECIES/ LANTANA
PHORMIUM TENAX SPP/ NEW ZEALAND FLAX
CISTUS SPP / ROCKROSE
ROMNEYA COULTERI `WHITE CLOUD` / WHITE CLOUD MATILIJA POPPY
FURCREA VARIEGATA/ FALSE AGAVE
BOUGAINVILLEA SPECIES / SHRUB FORM BOUGAINVILLEA
CEANOTHUS GRISEUS HORIZONTALIS `YANKEE POINT` / CALIFORNIA LILAC
BACCHARIS PILULARIS 'PIGEON POINT'/DWARF COYOTE BRUSH
ARBUTUS UNEDO 'COMPACTA'/ DWARF STRAWBERRY TREE

PRIVATE SLOPE PLANTING (MIN. SIZE FLATS, 1, 5, 15 GAL.)
MYOPORUM PARVIFOLIUM
BACCHARIS PILULARIS 'PIGEON POINT'/DWARF COYOTE BRUSH
LANTANA SPECIES/ LANTANA
ARCTOSTAPHYLOS EDMUNDSII 'CARMEL SUR'/ CARMEL SUR MANZANITA
CEANOTHUS GRISEUS HORIZONTALIS `YANKEE POINT` / CALIFORNIA LILAC

NATURAL TURF AS NOTED ON PLAN

MANUFACTURE SLOPE (MIN. SIZE FLATS, 1, 5, 15 GAL.)
BACCHARIS SPECIES / COYOTE BRUSH
CEANOTHUS LEUCODERMIS / CHAPARRAL WHITETHORN
DENDROMECON HARFORDII / ISLAND BUSH POPPY
FREMONTODENDRON MEXICANUM / SOUTHERN FLANNEL BUSH
LANTANA X `NEW GOLD` / NEW GOLD LANTANA
ROMNEYA COULTERI `WHITE CLOUD` / WHITE CLOUD MATILIJA POPPY
SALVIA X `ALLEN CHICKERING` / SAGE
COTONEASTER DAMMERI 'LOWFAST' LOWFAST BEARBERRY COTONEASTER
SPHAERALCEA AMBIGUA / DESERT GLOBEMALLOW
TRICHOSTEMA LANATUM / WOOLLY BLUE CURLS
MYOPORUM SPP./ MYOPORUM
CISTUS SPP/ ROCKROSE
ENCELIA CALIFORNICA/ COAST SUNFLOWER
PLUMBAGO AURICULATA/ CAPE PLUMBAGO
RHUS INTEGRIFOLIA/ LEMONADE BERRY

PARK/ OPENSPACE PLANTING (MIN. SIZE FLATS, 1, 5, 15 GAL.)
HESPERALOE PARVIFLORA HYBRIDS / RED YUCCA HYBRIDS
CEANOTHUS GRISEUS HORIZONTALIS `YANKEE POINT` / CALIFORNIA LILAC
GALVEZIA SPECIOSA `FIRECRACKER` / BUSH SNAPDRAGON
WESTRINGIA FRUTICOSA `WYNABBIE GEM` / WYNABBIE GEM COAST ROSEMARY
SENECIO SERPENS / BLUE CHALKSTICKS
LANTANA HYBRIDS / LANTANA
LOMANDRA BREEZE/ LOMANDRA
AGAVE DESMETTIANA `VARIEGATA` / VARIEGATED AGAVE
DIANELLA CAERULEA `CLARITY BLUE` / DIANELLA
DIANELLA TASMANICA VARIEGATA/ FLAX LILY
CARISSA MACROCARPA `GREEN CARPET` / GREEN CARPET NATAL PLUM
CEANOTHUS THYRSIFLORUS `DIAMOND HEIGHTS` / D.H CEANOTHUS
TRACHELOSPERMUM JASMINOIDES/ STAR JASMINE
LEYMUS CONDENSATUS 'CANYON PRINCE' / BLUE RYE'
PHORMIUM TENAX SPP/ NEW ZEALAND FLAX
FRAGARIA CHILOENSIS / ORNAMENTAL STRAWBERRY

PERIMETER PLANTING (MIN. SIZE FLATS, 1, 5, 15 GAL.)
CALLISTEMON VIMINALIS `BETTER JOHN` / DWARF WEEPING BOTTLE BRUSH
BOUGAINVILLEA X `ROSENKA` / BOUGAINVILLEA
HESPERALOE PARVIFLORA HYBRIDS / RED YUCCA HYBRIDS
CEANOTHUS GRISEUS HORIZONTALIS `YANKEE POINT` / CALIFORNIA LILAC
AGAVE SPP/ AGAVE
CARISSA MACROCARPA 'GREEN CARPTE'
FURCREA VARIEGATA/ FALSE AGAVE
WESTRINGIA FRUTICOSA `WYNABBIE GEM` / WYNABBIE GEM COAST ROSEMARY
SENECIO SERPENS / BLUE CHALKSTICKS
LANTANA HYBRIDS / LANTANA
LOMANDRA BREEZE/ LOMANDRA

RIGHT OF WAY PLANTING AREA (MIN. SIZE FLATS, 1, 5, GAL.)
HESPERALOE PARVIFLORA HYBRIDS / RED YUCCA HYBRIDS
SENECIO SERPENS / BLUE CHALK FINGERS
LANTANA SPP. / LANTANA
LOMANDRA BREEZE/ LOMANDRA
DIANELLA TASMANICA VARIEGATA/ FLAX LILY
WESTRINGIA FRUTICOSA `WYNABBIE GEM` / WYNABBIE GEM COAST ROSEMARY
PHORMIUM TENAX SPP. / NEW ZEALAND FLAX
CARISSA MACROCARPA `GREEN CARPET` / GREEN CARPET NATAL PLUM

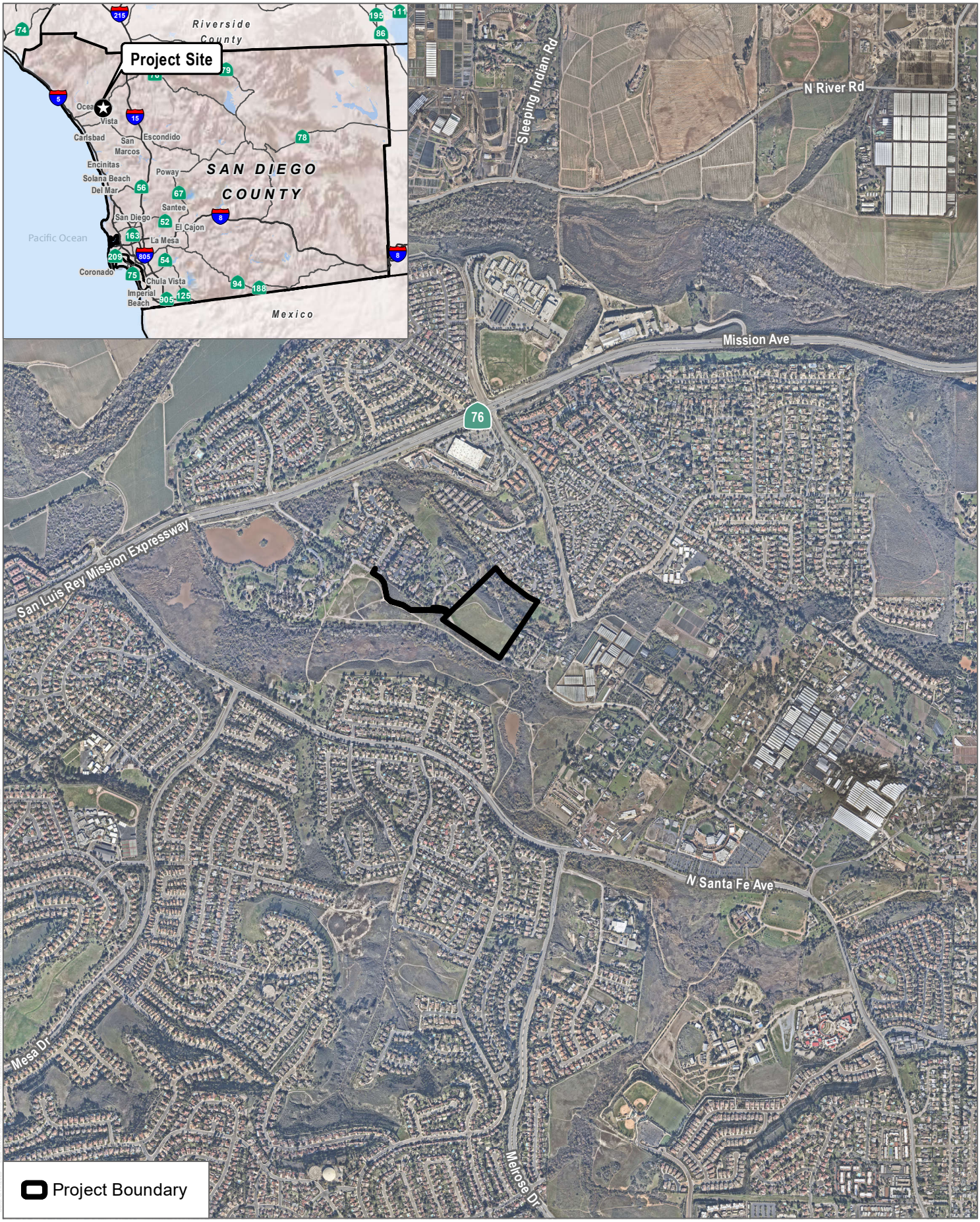
BIOBASIN PLANTING (MIN. SIZE FLATS, 1, 5, 15 GAL.)
JUNCUS PATENS/ CALIFORNIA RUSH
LEYMUS C. 'CANYON PRINCE' / CANYON PRINCE GIANT WILD RYE
LOMANDRA LONGIFOLIA 'BREEZE' / BREEZE MAT RUSH
MIMULUS CARDINALIS / SCARLET MONKEYFLOWER
FESTUCA CALIFORNICA/ CALIFORNIA FESCUE
ROSA CALIFORNICA/ CALIFORNIA WILD ROSE

SOURCE: Lightfoot Planning Group 2024

FIGURE 3-5b
Conceptual Landscape Plan
Guajome Lake Homes Project

DUDEK

Path: Z:\Projects\1441300\MAP\DOCDOCUMENT\Draft_EIR



SOURCE: SANGIS 2019, Open Street Maps 2019

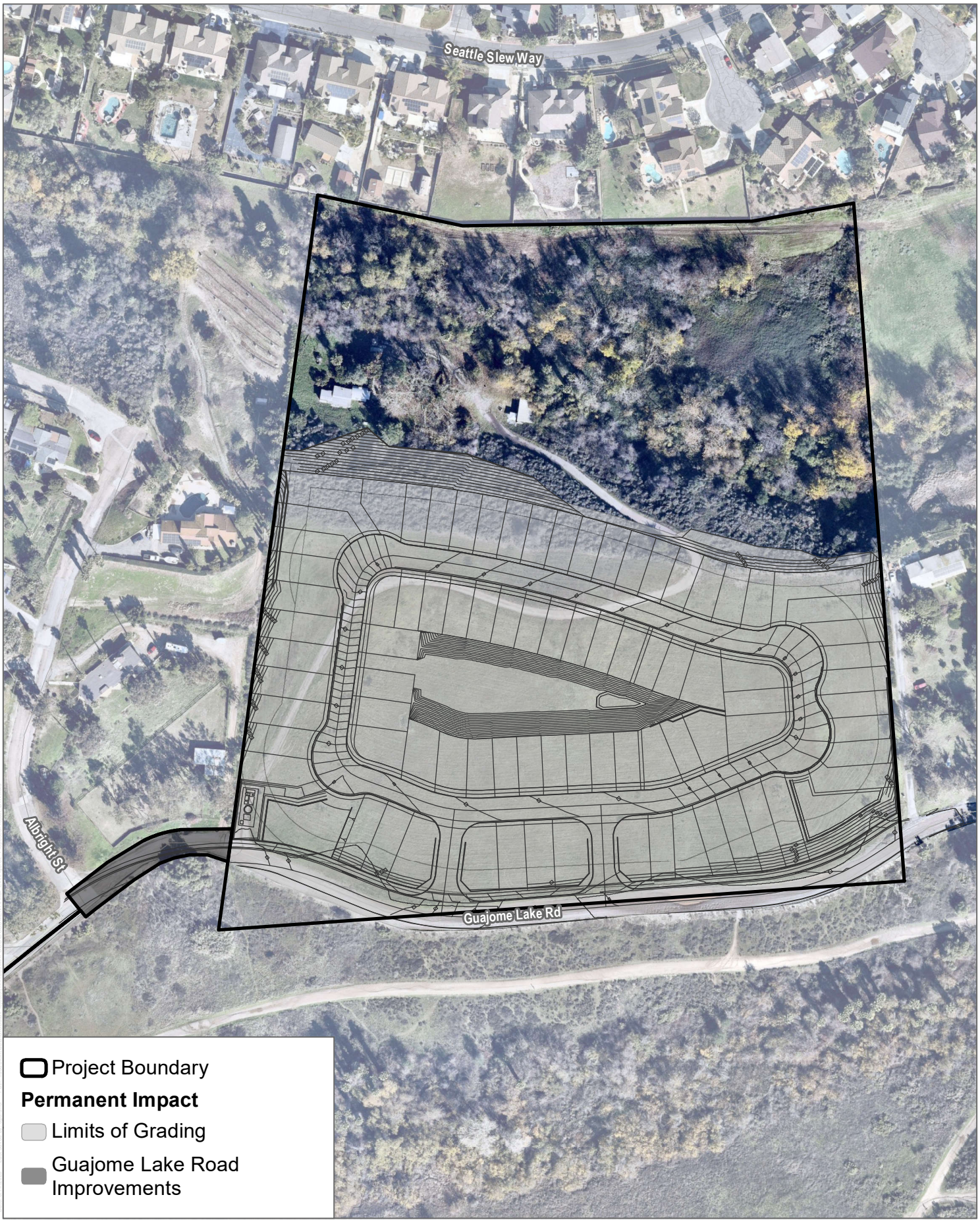
DUDEK

0 800 1,600 Feet

FIGURE 1

Project Location

Guajome Crest Project



SOURCE: SANGIS 2020, Open Streets Map 2019

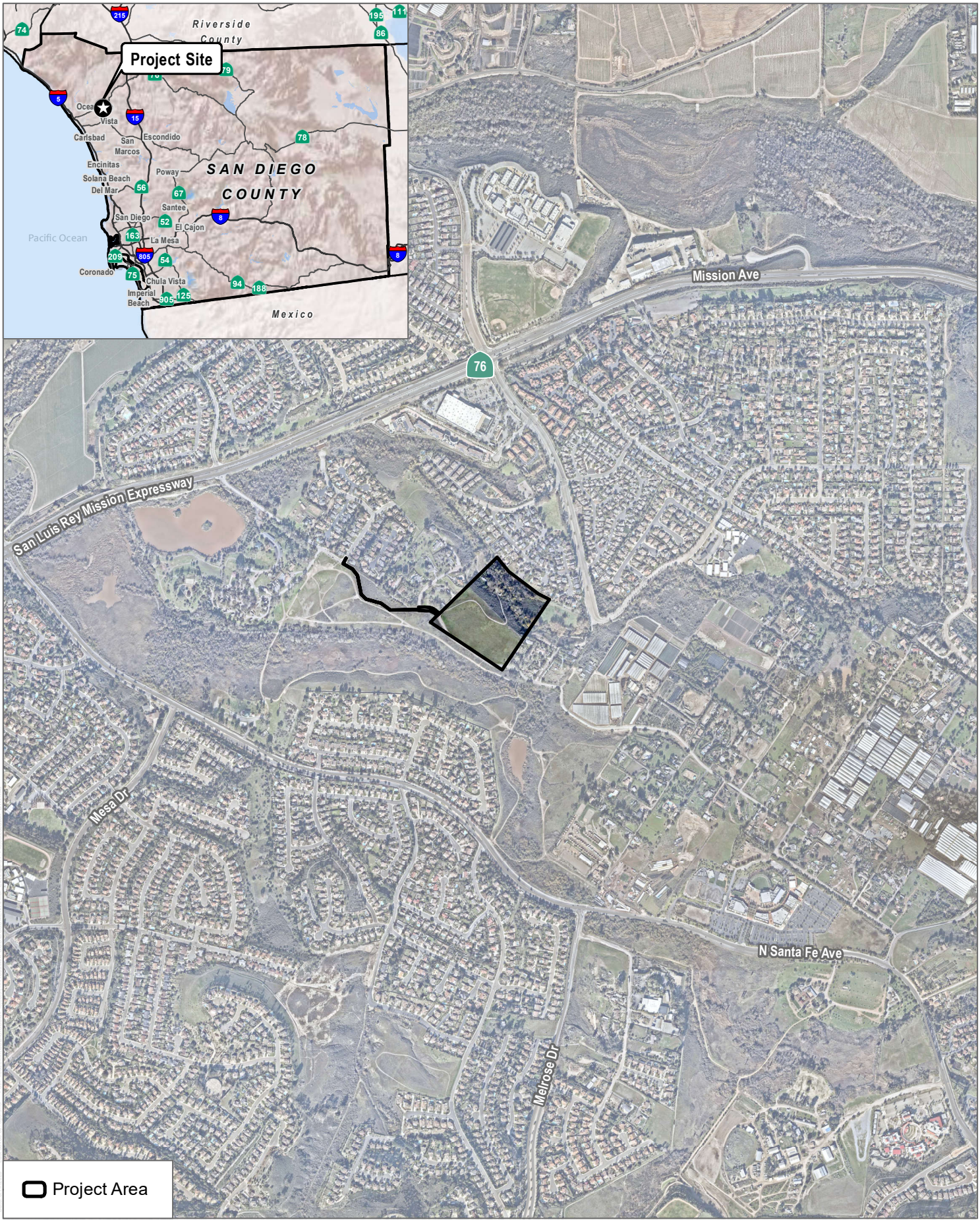
DUDEK

0 80 160 Feet

FIGURE 2

Proposed Project

Guajome Crest Project



SOURCE: SANGIS 2020, Open Street Maps 2019

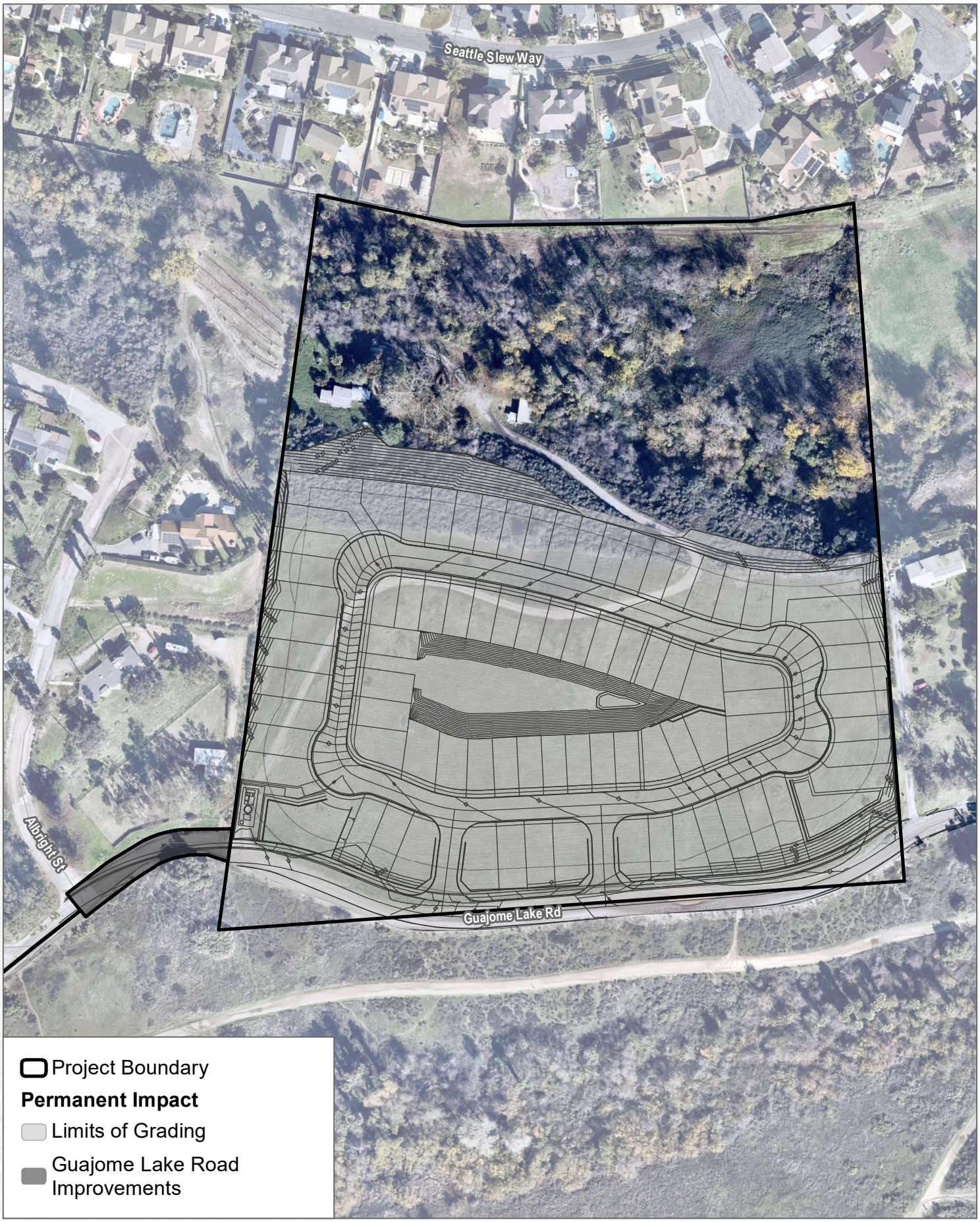
DUDEK

0 650 1,300 Feet

FIGURE 1

Project Location

Guajome Crest Project



SOURCE: SANGIS 2020, Open Streets Map 2019

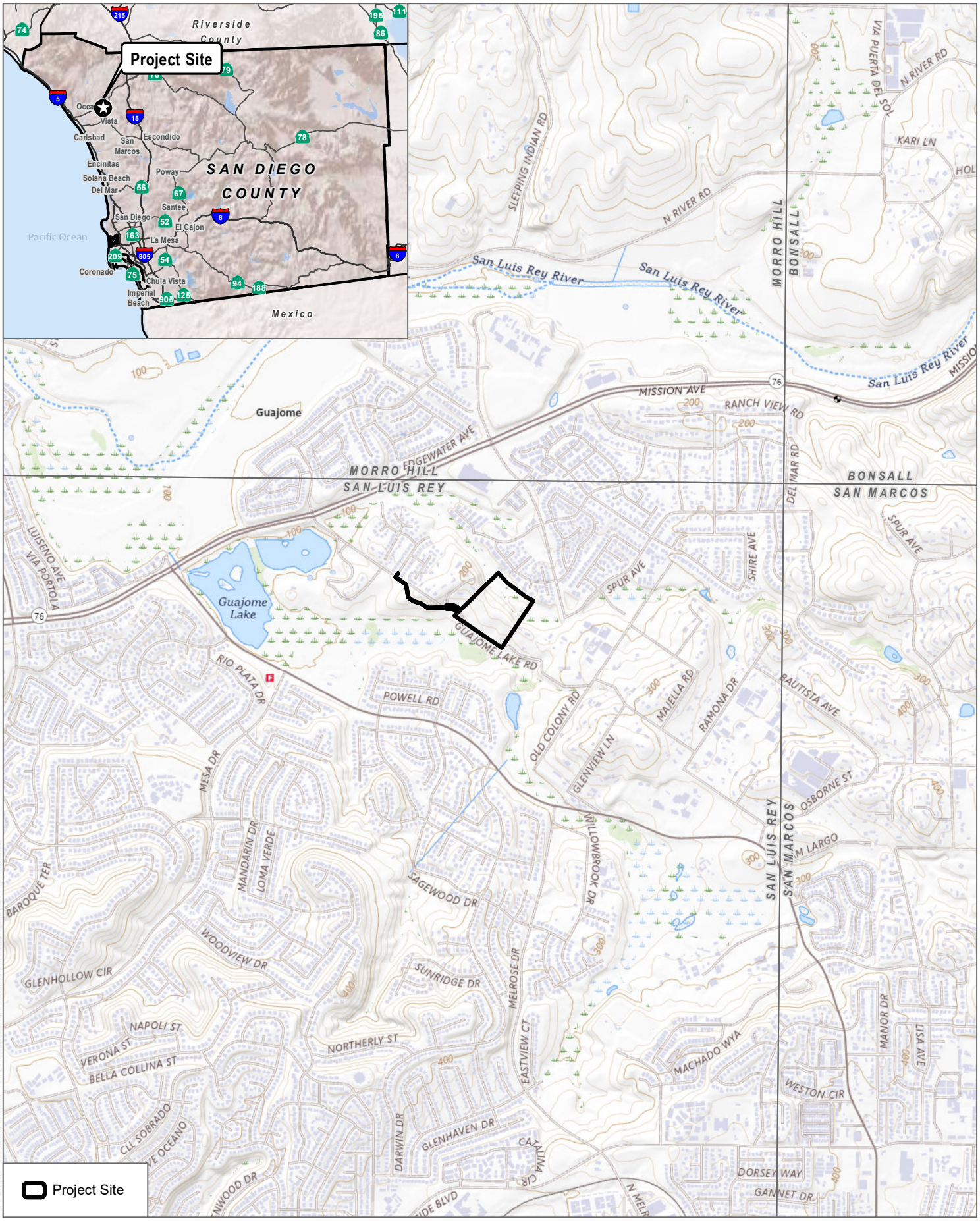
DUDEK

0 80 160 Feet

FIGURE 2

Proposed Project

Guajome Crest Project



SOURCE: USGS 7.5-MinuteSan Luis Rey Quadrangle
Township 11S / Range 4W / Section 02

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Guajome Crest Project



SOURCE: SanGIS 2019

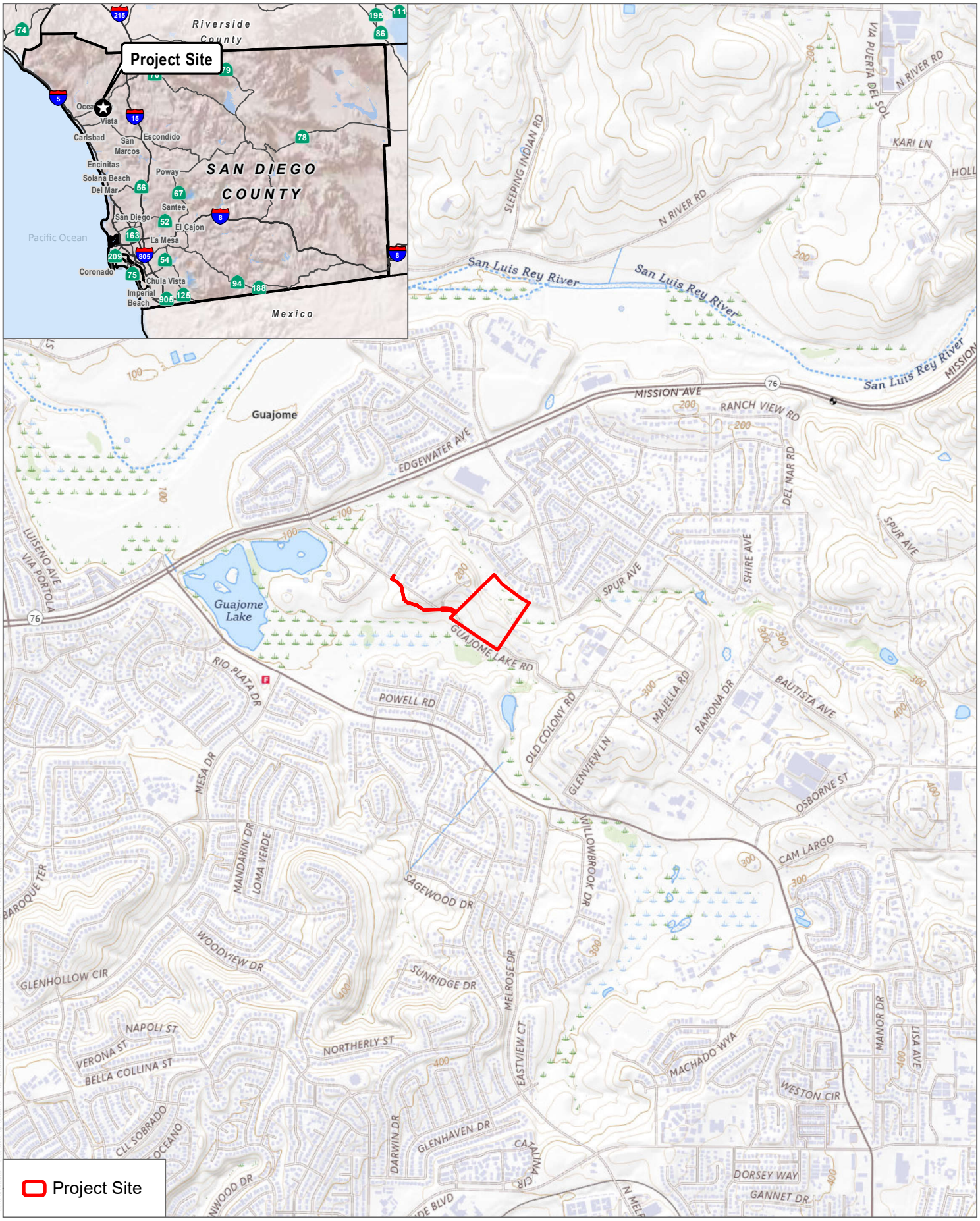
DUDEK

0 155 310 Feet

FIGURE 2

Area of Potential Effect (APE)

Guajome Crest Project



SOURCE: USGS 7.5-MinuteSan Luis Rey Quadrangle
Township 11S / Range 4W / Section 02

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Guajome Crest Project



SOURCE: Bing Maps Aerial, California Geological Survey

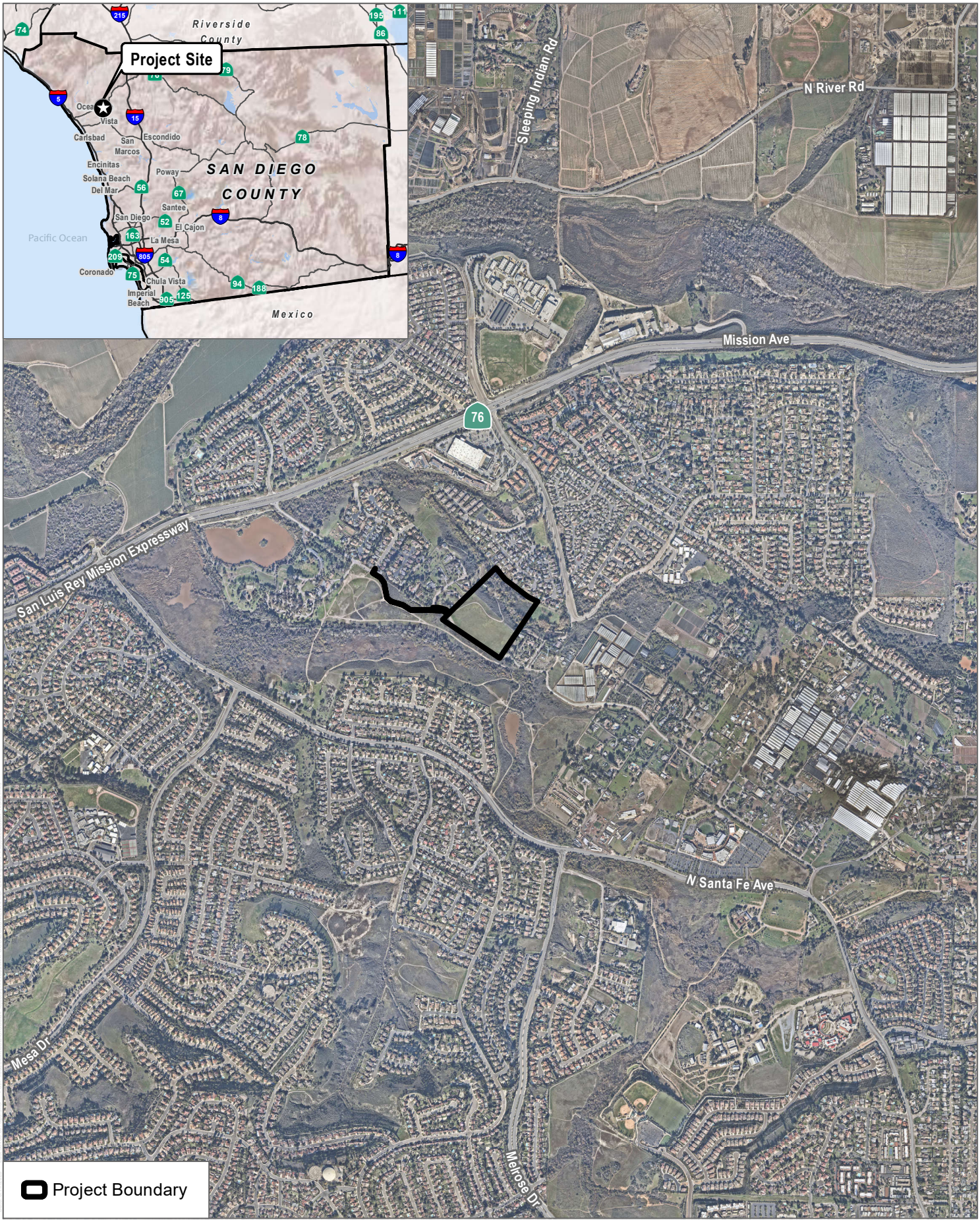
DUDEK

0 500 1,000 Feet

FIGURE 2

Geological Map

Guajome Crest Project



SOURCE: SANGIS 2019, Open Street Maps 2019

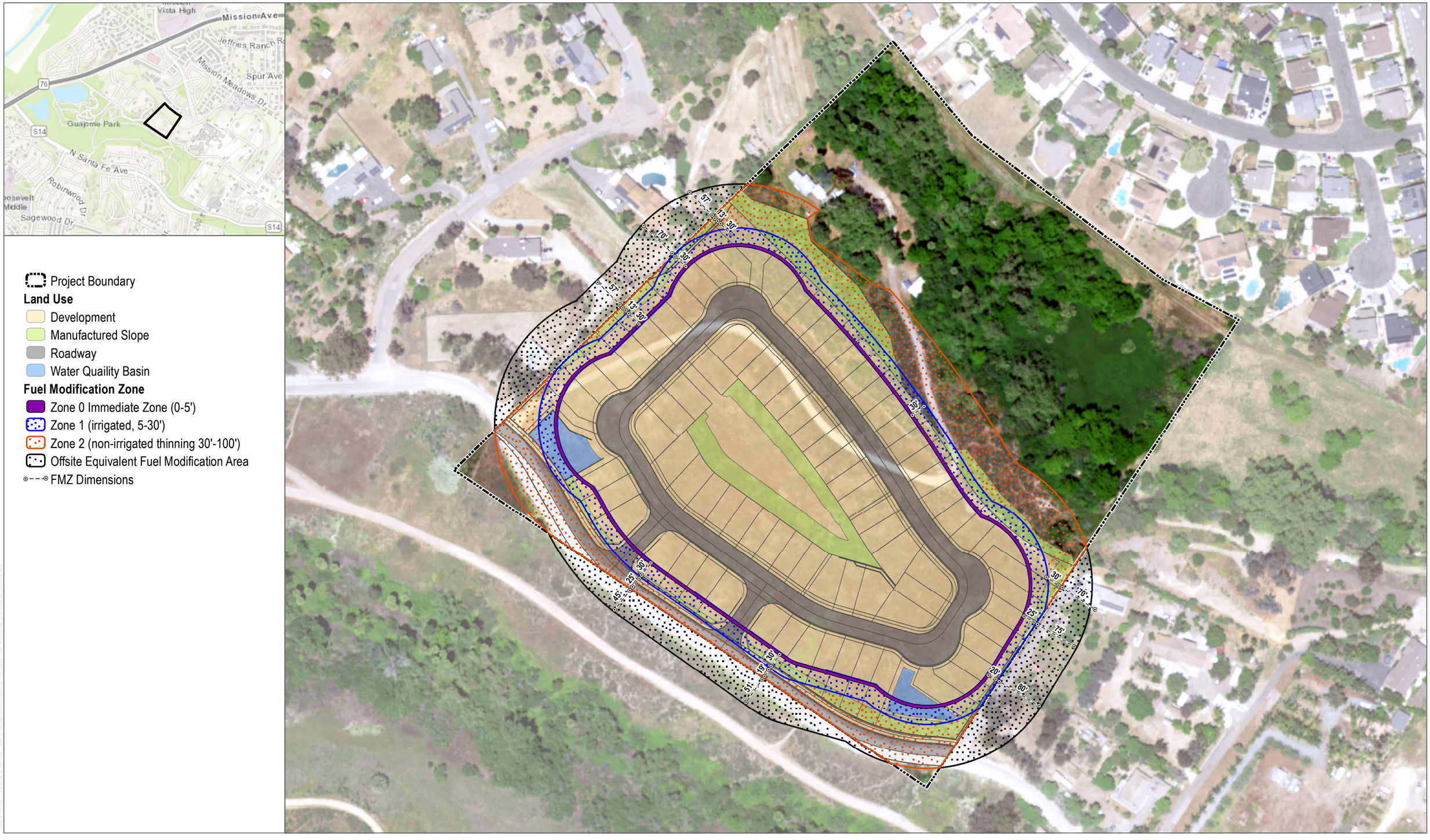
DUDEK

0 800 1,600 Feet

FIGURE 1

Project Location

Guajome Crest Project



SOURCE: AERIAL-NAIP 2020

DUDEK 0 70 140 Feet

FIGURE 4

Fuel Modification Plan

Fire Protection Plan for the Guajome Crest Project

Attachment B

Revised Appendix A (CalEEMod Output Files) of Appendix B (Air Quality and Greenhouse Gas Emissions Analysis Technical Report)

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Guajome Lake Road Residential - Unmitigated

San Diego County APCD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	5.00	Acre	5.00	217,800.00	0
City Park	0.79	Acre	0.79	34,391.00	0
Single Family Housing	84.00	Dwelling Unit	10.99	189,000.00	240

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	10			**Operational Year**	2025
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	539.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CalEEMod Defaults.

Land Use - See Project Description.

Construction Phase - CalEEMod Defaults.

Trips and VMT - Trips Modified to round up odd one way trips

Grading - 67,000 CY of export

Architectural Coating - SDACPD

Vehicle Trips - Trip genreation rates updated to be consistient with traffic analysis.

Road Dust - 800 feet of travel on unpaved road on 50% of the trips entering or exiting the Project site.

Woodstoves - CalEEMod defaults.

Area Coating - CalEEMod Defaults.

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - CalEEMod Defaults.

Energy Use - CalEEMod Defaults.

Water And Wastewater - CalEEMod Defaults.

Solid Waste - CalEEMod Defaults.

Construction Off-road Equipment Mitigation -

Mobile Land Use Mitigation - No Mitigation Applied.

Area Mitigation - No Mitigation Applied

Energy Mitigation - No Mitigation Applied

Water Mitigation - No Mitigation Applied

Waste Mitigation - No Mitigation Applied.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	127,575.00	102,060.00
tblArchitecturalCoating	ConstArea_Residential_Interior	382,725.00	306,180.00
tblAreaCoating	Area_Residential_Exterior	127575	102060
tblAreaCoating	Area_Residential_Interior	382725	306180
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblGrading	MaterialExported	0.00	50,250.00
tblGrading	MaterialExported	0.00	16,750.00
tblLandUse	LandUseSquareFeet	34,412.40	34,391.00
tblLandUse	LandUseSquareFeet	151,200.00	189,000.00
tblLandUse	LotAcreage	27.27	10.99
tblRoadDust	MeanVehicleSpeed	40	25
tblRoadDust	RoadPercentPave	100	99.14
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	15.00	16.00

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblTripsAndVMT	WorkerTripNumber	27.00	28.00
tblVehicleTrips	ST_TR	1.96	0.00
tblVehicleTrips	ST_TR	9.54	10.11
tblVehicleTrips	SU_TR	2.19	0.00
tblVehicleTrips	SU_TR	8.55	9.06
tblVehicleTrips	WD_TR	0.78	0.00
tblVehicleTrips	WD_TR	9.44	10.00

2.0 Emissions Summary

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8337	63.3146	36.2201	0.1901	23.7433	1.6598	25.2447	11.1929	1.5357	12.5827	0.0000	20,141.3591	20,141.3591	2.6485	2.2271	20,871.2588
2024	244.3609	15.8957	19.8435	0.0460	1.4559	0.6322	2.0880	0.3938	0.5948	0.9886	0.0000	4,555.3325	4,555.3325	0.7212	0.1827	4,626.4037
Maximum	**244.3609**	**63.3146**	**36.2201**	**0.1901**	**23.7433**	**1.6598**	**25.2447**	**11.1929**	**1.5357**	**12.5827**	**0.0000**	**20,141.3591**	**20,141.3591**	**2.6485**	**2.2271**	**20,871.2588**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8337	63.3146	36.2201	0.1901	12.8025	1.6598	14.3038	5.6169	1.5357	7.0068	0.0000	20,141.3591	20,141.3591	2.6485	2.2271	20,871.2588
2024	244.3609	15.8957	19.8435	0.0460	1.4559	0.6322	2.0880	0.3938	0.5948	0.9886	0.0000	4,555.3325	4,555.3325	0.7212	0.1827	4,626.4037
Maximum	**244.3609**	**63.3146**	**36.2201**	**0.1901**	**12.8025**	**1.6598**	**14.3038**	**5.6169**	**1.5357**	**7.0068**	**0.0000**	**20,141.3591**	**20,141.3591**	**2.6485**	**2.2271**	**20,871.2588**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	43.42	0.00	40.03	48.12	0.00	41.09	0.00	0.00	0.00	0.00	0.00	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584
Energy	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Mobile	2.2977	2.5377	21.5889	0.0449	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,573.2562	4,573.2562	0.3346	0.2108	4,644.4255
Total	**136.5900**	**5.7279**	**187.4532**	**0.3366**	**38.7700**	**22.3711**	**61.1411**	**4.7028**	**22.3687**	**27.0715**	**2,332.8254**	**6,329.9560**	**8,662.7814**	**2.5140**	**0.4083**	**8,847.3022**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584
Energy	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Mobile	2.2977	2.5377	21.5889	0.0449	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,573.2562	4,573.2562	0.3346	0.2108	4,644.4255
Total	**136.5900**	**5.7279**	**187.4532**	**0.3366**	**38.7700**	**22.3711**	**61.1411**	**4.7028**	**22.3687**	**27.0715**	**2,332.8254**	**6,329.9560**	**8,662.7814**	**2.5140**	**0.4083**	**8,847.3022**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/5/2023	6/16/2023	5	10	
2	Grading	Grading	6/17/2023	7/28/2023	5	30	
3	Building Construction	Building Construction	7/29/2023	9/20/2024	5	300	
4	Paving	Paving	9/21/2024	10/18/2024	5	20	
5	Architectural Coating	Architectural Coating	10/19/2024	11/15/2024	5	20	

Acres of Grading (Site Preparation Phase): 15

Acres of Grading (Grading Phase): 90

Acres of Paving: 5

Residential Indoor: 306,180; Residential Outdoor: 102,060; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 13,068 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	6.00	2,094.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	6,281.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	136.00	50.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	16.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	28.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					19.8924	0.0000	19.8924	10.1381	0.0000	10.1381			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647		3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**19.8924**	**1.2660**	**21.1584**	**10.1381**	**1.1647**	**11.3028**		**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4458	28.4973	7.6185	0.1254	3.6625	0.2329	3.8954	1.0039	0.2229	1.2267		13,860.6033	13,860.6033	0.6962	2.2043	14,534.8836
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0533	0.0344	0.4105	1.2300e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		124.8010	124.8010	3.8100e-003	3.5600e-003	125.9573
Total	**0.5061**	**28.7997**	**8.1245**	**0.1279**	**3.8510**	**0.2353**	**4.0863**	**1.0548**	**0.2251**	**1.2799**		**14,118.2210**	**14,118.2210**	**0.7040**	**2.2271**	**14,799.4937**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.9516	0.0000	8.9516	4.5621	0.0000	4.5621			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647	0.0000	3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**8.9516**	**1.2660**	**10.2176**	**4.5621**	**1.1647**	**5.7269**	**0.0000**	**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4458	28.4973	7.6185	0.1254	3.6625	0.2329	3.8954	1.0039	0.2229	1.2267		13,860.6033	13,860.6033	0.6962	2.2043	14,534.8836
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0533	0.0344	0.4105	1.2300e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		124.8010	124.8010	3.8100e-003	3.5600e-003	125.9573
Total	**0.5061**	**28.7997**	**8.1245**	**0.1279**	**3.8510**	**0.2353**	**4.0863**	**1.0548**	**0.2251**	**1.2799**		**14,118.2210**	**14,118.2210**	**0.7040**	**2.2271**	**14,799.4937**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.4390	0.0000	9.4390	3.6894	0.0000	3.6894			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105		6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**9.4390**	**1.4245**	**10.8635**	**3.6894**	**1.3105**	**4.9999**		**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4457	28.4928	7.6173	0.1254	3.6619	0.2329	3.8948	1.0037	0.2228	1.2265		13,858.3969	13,858.3969	0.6961	2.2039	14,532.5699
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0593	0.0382	0.4561	1.3700e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		138.6678	138.6678	4.2400e-003	3.9600e-003	139.9526
Total	**0.5120**	**28.7990**	**8.1689**	**0.1280**	**3.8668**	**0.2353**	**4.1022**	**1.0590**	**0.2251**	**1.2841**		**14,129.8814**	**14,129.8814**	**0.7043**	**2.2271**	**14,811.1753**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.2475	0.0000	4.2475	1.6602	0.0000	1.6602			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**4.2475**	**1.4245**	**5.6720**	**1.6602**	**1.3105**	**2.9708**	**0.0000**	**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4457	28.4928	7.6173	0.1254	3.6619	0.2329	3.8948	1.0037	0.2228	1.2265		13,858.3969	13,858.3969	0.6961	2.2039	14,532.5699
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0593	0.0382	0.4561	1.3700e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		138.6678	138.6678	4.2400e-003	3.9600e-003	139.9526
Total	**0.5120**	**28.7990**	**8.1689**	**0.1280**	**3.8668**	**0.2353**	**4.1022**	**1.0590**	**0.2251**	**1.2841**		**14,129.8814**	**14,129.8814**	**0.7043**	**2.2271**	**14,811.1753**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0581	2.2336	0.7957	0.0103	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,106.8061	1,106.8061	0.0333	0.1604	1,155.4398
Worker	0.4030	0.2596	3.1014	9.3300e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		942.9409	942.9409	0.0288	0.0269	951.6775
Total	**0.4611**	**2.4931**	**3.8972**	**0.0196**	**1.4558**	**0.0191**	**1.4750**	**0.3938**	**0.0181**	**0.4119**		**2,049.7470**	**2,049.7470**	**0.0621**	**0.1873**	**2,107.1173**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0581	2.2336	0.7957	0.0103	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,106.8061	1,106.8061	0.0333	0.1604	1,155.4398
Worker	0.4030	0.2596	3.1014	9.3300e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		942.9409	942.9409	0.0288	0.0269	951.6775
Total	**0.4611**	**2.4931**	**3.8972**	**0.0196**	**1.4558**	**0.0191**	**1.4750**	**0.3938**	**0.0181**	**0.4119**		**2,049.7470**	**2,049.7470**	**0.0621**	**0.1873**	**2,107.1173**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0558	2.2185	0.7776	0.0101	0.3386	0.0132	0.3518	0.0975	0.0126	0.1101		1,087.5534	1,087.5534	0.0341	0.1576	1,135.3692
Worker	0.3794	0.2334	2.8991	9.0200e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		912.0802	912.0802	0.0263	0.0251	920.2269
Total	**0.4351**	**2.4519**	**3.6766**	**0.0191**	**1.4559**	**0.0189**	**1.4747**	**0.3938**	**0.0179**	**0.4117**		**1,999.6336**	**1,999.6336**	**0.0604**	**0.1827**	**2,055.5961**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0558	2.2185	0.7776	0.0101	0.3386	0.0132	0.3518	0.0975	0.0126	0.1101		1,087.5534	1,087.5534	0.0341	0.1576	1,135.3692
Worker	0.3794	0.2334	2.8991	9.0200e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		912.0802	912.0802	0.0263	0.0251	920.2269
Total	**0.4351**	**2.4519**	**3.6766**	**0.0191**	**1.4559**	**0.0189**	**1.4747**	**0.3938**	**0.0179**	**0.4117**		**1,999.6336**	**1,999.6336**	**0.0604**	**0.1827**	**2,055.5961**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0446	0.0275	0.3411	1.0600e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		107.3036	107.3036	3.0900e-003	2.9600e-003	108.2620
Total	**0.0513**	**0.2937**	**0.4344**	**2.2700e-003**	**0.1721**	**2.2500e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**237.8100**	**237.8100**	**7.1800e-003**	**0.0219**	**244.5063**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0446	0.0275	0.3411	1.0600e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		107.3036	107.3036	3.0900e-003	2.9600e-003	108.2620
Total	**0.0513**	**0.2937**	**0.4344**	**2.2700e-003**	**0.1721**	**2.2500e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**237.8100**	**237.8100**	**7.1800e-003**	**0.0219**	**244.5063**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	244.0953					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**244.2761**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0781	0.0481	0.5969	1.8600e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		187.7812	187.7812	5.4100e-003	5.1700e-003	189.4585
Total	**0.0848**	**0.3143**	**0.6902**	**3.0700e-003**	**0.2707**	**2.7500e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**318.2876**	**318.2876**	**9.5000e-003**	**0.0241**	**325.7028**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	244.0953					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**244.2761**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0781	0.0481	0.5969	1.8600e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		187.7812	187.7812	5.4100e-003	5.1700e-003	189.4585
Total	**0.0848**	**0.3143**	**0.6902**	**3.0700e-003**	**0.2707**	**2.7500e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**318.2876**	**318.2876**	**9.5000e-003**	**0.0241**	**325.7028**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.2977	2.5377	21.5889	0.0449	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,573.2562	4,573.2562	0.3346	0.2108	4,644.4255
Unmitigated	2.2977	2.5377	21.5889	0.0449	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,573.2562	4,573.2562	0.3346	0.2108	4,644.4255

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Single Family Housing	840.00	849.24	761.04	2,370,016	2,370,016
Total	840.00	849.24	761.04	2,370,016	2,370,016

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	7.30	7.50	41.60	18.80	39.60	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Other Non-Asphalt Surfaces	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Single Family Housing	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
NaturalGas Unmitigated	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6509.87	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Total		**0.0702**	**0.5999**	**0.2553**	**3.8300e-003**		**0.0485**	**0.0485**		**0.0485**	**0.0485**		**765.8672**	**765.8672**	**0.0147**	**0.0140**	**770.4184**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6.50987	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Total		**0.0702**	**0.5999**	**0.2553**	**3.8300e-003**		**0.0485**	**0.0485**		**0.0485**	**0.0485**		**765.8672**	**765.8672**	**0.0147**	**0.0140**	**770.4184**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584
Unmitigated	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.3375					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.1235					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	128.5532	2.5105	158.6849	0.2875		22.2491	22.2491		22.2491	22.2491	2,332.8254	978.3529	3,311.1783	2.1528	0.1835	3,419.6799
Landscaping	0.2079	0.0798	6.9241	3.7000e-004		0.0384	0.0384		0.0384	0.0384		12.4797	12.4797	0.0120		12.7785
Total	**134.2221**	**2.5903**	**165.6091**	**0.2879**		**22.2876**	**22.2876**		**22.2876**	**22.2876**	**2,332.8254**	**990.8326**	**3,323.6580**	**2.1648**	**0.1835**	**3,432.4584**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.3375					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.1235					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	128.5532	2.5105	158.6849	0.2875		22.2491	22.2491		22.2491	22.2491	2,332.8254	978.3529	3,311.1783	2.1528	0.1835	3,419.6799
Landscaping	0.2079	0.0798	6.9241	3.7000e-004		0.0384	0.0384		0.0384	0.0384		12.4797	12.4797	0.0120		12.7785
Total	**134.2221**	**2.5903**	**165.6091**	**0.2879**		**22.2876**	**22.2876**		**22.2876**	**22.2876**	**2,332.8254**	**990.8326**	**3,323.6580**	**2.1648**	**0.1835**	**3,432.4584**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Guajome Lake Road Residential - Unmitigated

San Diego County APCD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	5.00	Acre	5.00	217,800.00	0
City Park	0.79	Acre	0.79	34,391.00	0
Single Family Housing	84.00	Dwelling Unit	10.99	189,000.00	240

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	10			**Operational Year**	2025
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	539.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CalEEMod Defaults.

Land Use - See Project Description.

Construction Phase - CalEEMod Defaults.

Trips and VMT - Trips Modified to round up odd one way trips

Grading - 67,000 CY of export

Architectural Coating - SDACPD

Vehicle Trips - Trip genreation rates updated to be consistient with traffic analysis.

Road Dust - 800 feet of travel on unpaved road on 50% of the trips entering or exiting the Project site.

Woodstoves - CalEEMod defaults.

Area Coating - CalEEMod Defaults.

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - CalEEMod Defaults.

Energy Use - CalEEMod Defaults.

Water And Wastewater - CalEEMod Defaults.

Solid Waste - CalEEMod Defaults.

Construction Off-road Equipment Mitigation -

Mobile Land Use Mitigation - No Mitigation Applied.

Area Mitigation - No Mitigation Applied

Energy Mitigation - No Mitigation Applied

Water Mitigation - No Mitigation Applied

Waste Mitigation - No Mitigation Applied.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	127,575.00	102,060.00
tblArchitecturalCoating	ConstArea_Residential_Interior	382,725.00	306,180.00
tblAreaCoating	Area_Residential_Exterior	127575	102060
tblAreaCoating	Area_Residential_Interior	382725	306180
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblGrading	MaterialExported	0.00	50,250.00
tblGrading	MaterialExported	0.00	16,750.00
tblLandUse	LandUseSquareFeet	34,412.40	34,391.00
tblLandUse	LandUseSquareFeet	151,200.00	189,000.00
tblLandUse	LotAcreage	27.27	10.99
tblRoadDust	MeanVehicleSpeed	40	25
tblRoadDust	RoadPercentPave	100	99.14
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	15.00	16.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblTripsAndVMT	WorkerTripNumber	27.00	28.00
tblVehicleTrips	ST_TR	1.96	0.00
tblVehicleTrips	ST_TR	9.54	10.11
tblVehicleTrips	SU_TR	2.19	0.00
tblVehicleTrips	SU_TR	8.55	9.06
tblVehicleTrips	WD_TR	0.78	0.00
tblVehicleTrips	WD_TR	9.44	10.00

2.0 Emissions Summary

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8577	62.1949	36.1474	0.1900	23.7433	1.6594	25.2442	11.1929	1.5352	12.5823	0.0000	20,135.7819	20,135.7819	2.6500	2.2246	20,864.9511
2024	244.3548	15.7801	19.9661	0.0466	1.4559	0.6321	2.0880	0.3938	0.5947	0.9885	0.0000	4,606.6641	4,606.6641	0.7210	0.1805	4,677.0262
Maximum	**244.3548**	**62.1949**	**36.1474**	**0.1900**	**23.7433**	**1.6594**	**25.2442**	**11.1929**	**1.5352**	**12.5823**	**0.0000**	**20,135.7819**	**20,135.7819**	**2.6500**	**2.2246**	**20,864.9511**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8577	62.1949	36.1474	0.1900	12.8025	1.6594	14.3034	5.6169	1.5352	7.0063	0.0000	20,135.7819	20,135.7819	2.6500	2.2246	20,864.9511
2024	244.3548	15.7801	19.9661	0.0466	1.4559	0.6321	2.0880	0.3938	0.5947	0.9885	0.0000	4,606.6641	4,606.6641	0.7210	0.1805	4,677.0262
Maximum	**244.3548**	**62.1949**	**36.1474**	**0.1900**	**12.8025**	**1.6594**	**14.3034**	**5.6169**	**1.5352**	**7.0063**	**0.0000**	**20,135.7819**	**20,135.7819**	**2.6500**	**2.2246**	**20,864.9511**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	43.42	0.00	40.03	48.12	0.00	41.09	0.00	0.00	0.00	0.00	0.00	0.00

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584
Energy	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Mobile	2.3532	2.3427	21.0371	0.0469	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,779.7270	4,779.7270	0.3169	0.2002	4,847.3096
Total	**136.6456**	**5.5329**	**186.9015**	**0.3386**	**38.7700**	**22.3711**	**61.1410**	**4.7028**	**22.3687**	**27.0715**	**2,332.8254**	**6,536.4268**	**8,869.2522**	**2.4963**	**0.3977**	**9,050.1864**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584
Energy	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Mobile	2.3532	2.3427	21.0371	0.0469	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,779.7270	4,779.7270	0.3169	0.2002	4,847.3096
Total	**136.6456**	**5.5329**	**186.9015**	**0.3386**	**38.7700**	**22.3711**	**61.1410**	**4.7028**	**22.3687**	**27.0715**	**2,332.8254**	**6,536.4268**	**8,869.2522**	**2.4963**	**0.3977**	**9,050.1864**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/5/2023	6/16/2023	5	10	
2	Grading	Grading	6/17/2023	7/28/2023	5	30	
3	Building Construction	Building Construction	7/29/2023	9/20/2024	5	300	
4	Paving	Paving	9/21/2024	10/18/2024	5	20	
5	Architectural Coating	Architectural Coating	10/19/2024	11/15/2024	5	20	

Acres of Grading (Site Preparation Phase): 15

Acres of Grading (Grading Phase): 90

Acres of Paving: 5

Residential Indoor: 306,180; Residential Outdoor: 102,060; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 13,068 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	6.00	2,094.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	6,281.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	136.00	50.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	16.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	28.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					19.8924	0.0000	19.8924	10.1381	0.0000	10.1381			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647		3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**19.8924**	**1.2660**	**21.1584**	**10.1381**	**1.1647**	**11.3028**		**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4742	27.3925	7.5248	0.1253	3.6625	0.2325	3.8949	1.0039	0.2224	1.2263		13,847.1475	13,847.1475	0.6979	2.2021	14,520.8055
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0492	0.0306	0.4320	1.3100e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		132.0595	132.0595	3.5800e-003	3.2900e-003	133.1300
Total	**0.5306**	**27.6803**	**8.0494**	**0.1278**	**3.8510**	**0.2348**	**4.0858**	**1.0548**	**0.2247**	**1.2795**		**14,111.8352**	**14,111.8352**	**0.7055**	**2.2245**	**14,792.3868**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.9516	0.0000	8.9516	4.5621	0.0000	4.5621			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647	0.0000	3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**8.9516**	**1.2660**	**10.2176**	**4.5621**	**1.1647**	**5.7269**	**0.0000**	**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4742	27.3925	7.5248	0.1253	3.6625	0.2325	3.8949	1.0039	0.2224	1.2263		13,847.1475	13,847.1475	0.6979	2.2021	14,520.8055
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0492	0.0306	0.4320	1.3100e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		132.0595	132.0595	3.5800e-003	3.2900e-003	133.1300
Total	**0.5306**	**27.6803**	**8.0494**	**0.1278**	**3.8510**	**0.2348**	**4.0858**	**1.0548**	**0.2247**	**1.2795**		**14,111.8352**	**14,111.8352**	**0.7055**	**2.2245**	**14,792.3868**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.4390	0.0000	9.4390	3.6894	0.0000	3.6894			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105		6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**9.4390**	**1.4245**	**10.8635**	**3.6894**	**1.3105**	**4.9999**		**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4741	27.3881	7.5236	0.1253	3.6619	0.2325	3.8943	1.0037	0.2224	1.2261		13,844.9432	13,844.9432	0.6978	2.2017	14,518.4940
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0547	0.0339	0.4800	1.4500e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		146.7328	146.7328	3.9800e-003	3.6600e-003	147.9223
Total	**0.5360**	**27.6793**	**8.0962**	**0.1280**	**3.8668**	**0.2349**	**4.1017**	**1.0590**	**0.2247**	**1.2837**		**14,124.3042**	**14,124.3042**	**0.7058**	**2.2246**	**14,804.8675**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.2475	0.0000	4.2475	1.6602	0.0000	1.6602			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**4.2475**	**1.4245**	**5.6720**	**1.6602**	**1.3105**	**2.9708**	**0.0000**	**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4741	27.3881	7.5236	0.1253	3.6619	0.2325	3.8943	1.0037	0.2224	1.2261		13,844.9432	13,844.9432	0.6978	2.2017	14,518.4940
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0547	0.0339	0.4800	1.4500e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		146.7328	146.7328	3.9800e-003	3.6600e-003	147.9223
Total	**0.5360**	**27.6793**	**8.0962**	**0.1280**	**3.8668**	**0.2349**	**4.1017**	**1.0590**	**0.2247**	**1.2837**		**14,124.3042**	**14,124.3042**	**0.7058**	**2.2246**	**14,804.8675**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0597	2.1434	0.7724	0.0102	0.3386	0.0131	0.3517	0.0975	0.0125	0.1100		1,105.2348	1,105.2348	0.0335	0.1600	1,153.7610
Worker	0.3717	0.2308	3.2639	9.8700e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		997.7831	997.7831	0.0270	0.0249	1,005.8713
Total	**0.4314**	**2.3742**	**4.0363**	**0.0201**	**1.4558**	**0.0191**	**1.4749**	**0.3938**	**0.0180**	**0.4118**		**2,103.0179**	**2,103.0179**	**0.0605**	**0.1849**	**2,159.6323**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0597	2.1434	0.7724	0.0102	0.3386	0.0131	0.3517	0.0975	0.0125	0.1100		1,105.2348	1,105.2348	0.0335	0.1600	1,153.7610
Worker	0.3717	0.2308	3.2639	9.8700e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		997.7831	997.7831	0.0270	0.0249	1,005.8713
Total	**0.4314**	**2.3742**	**4.0363**	**0.0201**	**1.4558**	**0.0191**	**1.4749**	**0.3938**	**0.0180**	**0.4118**		**2,103.0179**	**2,103.0179**	**0.0605**	**0.1849**	**2,159.6323**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0575	2.1288	0.7544	0.0101	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,085.9653	1,085.9653	0.0343	0.1572	1,133.6765
Worker	0.3490	0.2075	3.0449	9.5500e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		964.9998	964.9998	0.0246	0.0232	972.5420
Total	**0.4065**	**2.3363**	**3.7993**	**0.0196**	**1.4559**	**0.0188**	**1.4747**	**0.3938**	**0.0178**	**0.4116**		**2,050.9652**	**2,050.9652**	**0.0589**	**0.1805**	**2,106.2185**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0575	2.1288	0.7544	0.0101	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,085.9653	1,085.9653	0.0343	0.1572	1,133.6765
Worker	0.3490	0.2075	3.0449	9.5500e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		964.9998	964.9998	0.0246	0.0232	972.5420
Total	**0.4065**	**2.3363**	**3.7993**	**0.0196**	**1.4559**	**0.0188**	**1.4747**	**0.3938**	**0.0178**	**0.4116**		**2,050.9652**	**2,050.9652**	**0.0589**	**0.1805**	**2,106.2185**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0411	0.0244	0.3582	1.1200e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		113.5294	113.5294	2.9000e-003	2.7300e-003	114.4167
Total	**0.0480**	**0.2799**	**0.4487**	**2.3300e-003**	**0.1721**	**2.2400e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**243.8452**	**243.8452**	**7.0100e-003**	**0.0216**	**250.4579**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0411	0.0244	0.3582	1.1200e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		113.5294	113.5294	2.9000e-003	2.7300e-003	114.4167
Total	**0.0480**	**0.2799**	**0.4487**	**2.3300e-003**	**0.1721**	**2.2400e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**243.8452**	**243.8452**	**7.0100e-003**	**0.0216**	**250.4579**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	244.0953					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**244.2761**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0719	0.0427	0.6269	1.9700e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		198.6764	198.6764	5.0700e-003	4.7900e-003	200.2292
Total	**0.0788**	**0.2982**	**0.7174**	**3.1800e-003**	**0.2707**	**2.7400e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**328.9923**	**328.9923**	**9.1800e-003**	**0.0237**	**336.2704**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	244.0953					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**244.2761**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0719	0.0427	0.6269	1.9700e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		198.6764	198.6764	5.0700e-003	4.7900e-003	200.2292
Total	**0.0788**	**0.2982**	**0.7174**	**3.1800e-003**	**0.2707**	**2.7400e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**328.9923**	**328.9923**	**9.1800e-003**	**0.0237**	**336.2704**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.3532	2.3427	21.0371	0.0469	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,779.7270	4,779.7270	0.3169	0.2002	4,847.3096
Unmitigated	2.3532	2.3427	21.0371	0.0469	38.7700	0.0350	38.8050	4.7028	0.0327	4.7355		4,779.7270	4,779.7270	0.3169	0.2002	4,847.3096

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Single Family Housing	840.00	849.24	761.04	2,370,016	2,370,016
Total	840.00	849.24	761.04	2,370,016	2,370,016

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	7.30	7.50	41.60	18.80	39.60	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Other Non-Asphalt Surfaces	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Single Family Housing	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
NaturalGas Unmitigated	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6509.87	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Total		**0.0702**	**0.5999**	**0.2553**	**3.8300e-003**		**0.0485**	**0.0485**		**0.0485**	**0.0485**		**765.8672**	**765.8672**	**0.0147**	**0.0140**	**770.4184**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6.50987	0.0702	0.5999	0.2553	3.8300e-003		0.0485	0.0485		0.0485	0.0485		765.8672	765.8672	0.0147	0.0140	770.4184
Total		**0.0702**	**0.5999**	**0.2553**	**3.8300e-003**		**0.0485**	**0.0485**		**0.0485**	**0.0485**		**765.8672**	**765.8672**	**0.0147**	**0.0140**	**770.4184**

6.0 Area Detail

6.1 Mitigation Measures Area

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584
Unmitigated	134.2221	2.5903	165.6091	0.2879		22.2876	22.2876		22.2876	22.2876	2,332.8254	990.8326	3,323.6580	2.1648	0.1835	3,432.4584

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.3375					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.1235					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	128.5532	2.5105	158.6849	0.2875		22.2491	22.2491		22.2491	22.2491	2,332.8254	978.3529	3,311.1783	2.1528	0.1835	3,419.6799
Landscaping	0.2079	0.0798	6.9241	3.7000e-004		0.0384	0.0384		0.0384	0.0384		12.4797	12.4797	0.0120		12.7785
Total	**134.2221**	**2.5903**	**165.6091**	**0.2879**		**22.2876**	**22.2876**		**22.2876**	**22.2876**	**2,332.8254**	**990.8326**	**3,323.6580**	**2.1648**	**0.1835**	**3,432.4584**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.3375					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.1235					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	128.5532	2.5105	158.6849	0.2875		22.2491	22.2491		22.2491	22.2491	2,332.8254	978.3529	3,311.1783	2.1528	0.1835	3,419.6799
Landscaping	0.2079	0.0798	6.9241	3.7000e-004		0.0384	0.0384		0.0384	0.0384		12.4797	12.4797	0.0120		12.7785
Total	**134.2221**	**2.5903**	**165.6091**	**0.2879**		**22.2876**	**22.2876**		**22.2876**	**22.2876**	**2,332.8254**	**990.8326**	**3,323.6580**	**2.1648**	**0.1835**	**3,432.4584**

7.0 Water Detail

7.1 Mitigation Measures Water

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Guajome Lake Road Residential - Unmitigated

San Diego County APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	5.00	Acre	5.00	217,800.00	0
City Park	0.79	Acre	0.79	34,391.00	0
Single Family Housing	84.00	Dwelling Unit	10.99	189,000.00	240

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	10			**Operational Year**	2025
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	539.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CalEEMod Defaults.

Land Use - See Project Description.

Construction Phase - CalEEMod Defaults.

Trips and VMT - Trips Modified to round up odd one way trips

Grading - 67,000 CY of export

Architectural Coating - SDACPD

Vehicle Trips - Trip genreation rates updated to be consistient with traffic analysis.

Road Dust - 800 feet of travel on unpaved road on 50% of the trips entering or exiting the Project site.

Woodstoves - CalEEMod defaults.

Area Coating - CalEEMod Defaults.

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Landscape Equipment - CalEEMod Defaults.

Energy Use - CalEEMod Defaults.

Water And Wastewater - CalEEMod Defaults.

Solid Waste - CalEEMod Defaults.

Construction Off-road Equipment Mitigation -

Mobile Land Use Mitigation - No Mitigation Applied.

Area Mitigation - No Mitigation Applied

Energy Mitigation - No Mitigation Applied

Water Mitigation - No Mitigation Applied

Waste Mitigation - No Mitigation Applied.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Residential_Exterior	127,575.00	102,060.00
tblArchitecturalCoating	ConstArea_Residential_Interior	382,725.00	306,180.00
tblAreaCoating	Area_Residential_Exterior	127575	102060
tblAreaCoating	Area_Residential_Interior	382725	306180
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblGrading	MaterialExported	0.00	50,250.00
tblGrading	MaterialExported	0.00	16,750.00
tblLandUse	LandUseSquareFeet	34,412.40	34,391.00
tblLandUse	LandUseSquareFeet	151,200.00	189,000.00
tblLandUse	LotAcreage	27.27	10.99
tblRoadDust	MeanVehicleSpeed	40	25
tblRoadDust	RoadPercentPave	100	99.14
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	15.00	16.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblTripsAndVMT	WorkerTripNumber	27.00	28.00
tblVehicleTrips	ST_TR	1.96	0.00
tblVehicleTrips	ST_TR	9.54	10.11
tblVehicleTrips	SU_TR	2.19	0.00
tblVehicleTrips	SU_TR	8.55	9.06
tblVehicleTrips	WD_TR	0.78	0.00
tblVehicleTrips	WD_TR	9.44	10.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1835	2.1570	1.7809	6.2400e-003	0.3949	0.0719	0.4669	0.1480	0.0672	0.2152	0.0000	584.8581	584.8581	0.0781	0.0497	601.6214
2024	2.6319	1.6218	2.0592	4.6900e-003	0.1395	0.0654	0.2049	0.0378	0.0615	0.0993	0.0000	420.8520	420.8520	0.0640	0.0161	427.2564
Maximum	**2.6319**	**2.1570**	**2.0592**	**6.2400e-003**	**0.3949**	**0.0719**	**0.4669**	**0.1480**	**0.0672**	**0.2152**	**0.0000**	**584.8581**	**584.8581**	**0.0781**	**0.0497**	**601.6214**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1835	2.1570	1.7809	6.2400e-003	0.2624	0.0719	0.3343	0.0897	0.0672	0.1569	0.0000	584.8578	584.8578	0.0781	0.0497	601.6212
2024	2.6319	1.6218	2.0592	4.6900e-003	0.1395	0.0654	0.2049	0.0378	0.0615	0.0993	0.0000	420.8517	420.8517	0.0640	0.0161	427.2561
Maximum	**2.6319**	**2.1570**	**2.0592**	**6.2400e-003**	**0.2624**	**0.0719**	**0.3343**	**0.0897**	**0.0672**	**0.1569**	**0.0000**	**584.8578**	**584.8578**	**0.0781**	**0.0497**	**601.6212**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**24.81**	**0.00**	**19.74**	**31.39**	**0.00**	**18.55**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**6-5-2023**	**9-4-2023**	1.4957	1.4957
2	**9-5-2023**	**12-4-2023**	0.6133	0.6133
3	**12-5-2023**	**3-4-2024**	0.5893	0.5893
4	**3-5-2024**	**6-4-2024**	0.5816	0.5816
5	**6-5-2024**	**9-4-2024**	0.5802	0.5802
6	**9-5-2024**	**9-30-2024**	0.1396	0.1396
		Highest	1.4957	1.4957

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	6.2860	0.1101	7.1293	0.0118		0.9157	0.9157		0.9157	0.9157	86.7685	37.4083	124.1768	0.0811	6.8200e-003	128.2369
Energy	0.0128	0.1095	0.0466	7.0000e-004		8.8500e-003	8.8500e-003		8.8500e-003	8.8500e-003	0.0000	290.6643	290.6643	0.0124	3.5400e-003	292.0299
Mobile	0.4013	0.4464	3.7635	8.0200e-003	6.8753	6.2200e-003	6.8816	0.8313	5.8000e-003	0.8371	0.0000	742.1157	742.1157	0.0530	0.0337	753.4747
Waste						0.0000	0.0000		0.0000	0.0000	19.9885	0.0000	19.9885	1.1813	0.0000	49.5207
Water						0.0000	0.0000		0.0000	0.0000	1.7363	29.4049	31.1412	0.1801	4.4300e-003	36.9643
Total	**6.7002**	**0.6660**	**10.9394**	**0.0205**	**6.8753**	**0.9307**	**7.8061**	**0.8313**	**0.9303**	**1.7617**	**108.4933**	**1,099.5932**	**1,208.0865**	**1.5079**	**0.0485**	**1,260.2264**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	6.2860	0.1101	7.1293	0.0118		0.9157	0.9157		0.9157	0.9157	86.7685	37.4083	124.1768	0.0811	6.8200e-003	128.2369
Energy	0.0128	0.1095	0.0466	7.0000e-004		8.8500e-003	8.8500e-003		8.8500e-003	8.8500e-003	0.0000	290.6643	290.6643	0.0124	3.5400e-003	292.0299
Mobile	0.4013	0.4464	3.7635	8.0200e-003	6.8753	6.2200e-003	6.8816	0.8313	5.8000e-003	0.8371	0.0000	742.1157	742.1157	0.0530	0.0337	753.4747
Waste						0.0000	0.0000		0.0000	0.0000	19.9885	0.0000	19.9885	1.1813	0.0000	49.5207
Water						0.0000	0.0000		0.0000	0.0000	1.7363	29.4049	31.1412	0.1801	4.4300e-003	36.9643
Total	**6.7002**	**0.6660**	**10.9394**	**0.0205**	**6.8753**	**0.9307**	**7.8061**	**0.8313**	**0.9303**	**1.7617**	**108.4933**	**1,099.5932**	**1,208.0865**	**1.5079**	**0.0485**	**1,260.2264**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/5/2023	6/16/2023	5	10	
2	Grading	Grading	6/17/2023	7/28/2023	5	30	
3	Building Construction	Building Construction	7/29/2023	9/20/2024	5	300	

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4	Paving	Paving	9/21/2024	10/18/2024	5	20	
5	Architectural Coating	Architectural Coating	10/19/2024	11/15/2024	5	20	

Acres of Grading (Site Preparation Phase): 15

Acres of Grading (Grading Phase): 90

Acres of Paving: 5

Residential Indoor: 306,180; Residential Outdoor: 102,060; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 13,068 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	6.00	2,094.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	6,281.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	136.00	50.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	16.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	28.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0995	0.0000	0.0995	0.0507	0.0000	0.0507	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0133	0.1376	0.0912	1.9000e-004		6.3300e-003	6.3300e-003		5.8200e-003	5.8200e-003	0.0000	16.7254	16.7254	5.4100e-003	0.0000	16.8606
Total	**0.0133**	**0.1376**	**0.0912**	**1.9000e-004**	**0.0995**	**6.3300e-003**	**0.1058**	**0.0507**	**5.8200e-003**	**0.0565**	**0.0000**	**16.7254**	**16.7254**	**5.4100e-003**	**0.0000**	**16.8606**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.3100e-003	0.1421	0.0378	6.3000e-004	0.0179	1.1600e-003	0.0191	4.9300e-003	1.1100e-003	6.0400e-003	0.0000	62.8352	62.8352	3.1600e-003	9.9900e-003	65.8921
Vendor	4.0000e-005	1.3300e-003	4.7000e-004	1.0000e-005	2.0000e-004	1.0000e-005	2.1000e-004	6.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.6020	0.6020	2.0000e-005	9.0000e-005	0.6284
Worker	2.4000e-004	1.7000e-004	2.0500e-003	1.0000e-005	7.2000e-004	0.0000	7.3000e-004	1.9000e-004	0.0000	2.0000e-004	0.0000	0.5711	0.5711	2.0000e-005	2.0000e-005	0.5763
Total	**2.5900e-003**	**0.1436**	**0.0403**	**6.5000e-004**	**0.0189**	**1.1700e-003**	**0.0200**	**5.1800e-003**	**1.1200e-003**	**6.3100e-003**	**0.0000**	**64.0083**	**64.0083**	**3.2000e-003**	**0.0101**	**67.0968**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0448	0.0000	0.0448	0.0228	0.0000	0.0228	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0133	0.1376	0.0912	1.9000e-004		6.3300e-003	6.3300e-003		5.8200e-003	5.8200e-003	0.0000	16.7253	16.7253	5.4100e-003	0.0000	16.8606
Total	**0.0133**	**0.1376**	**0.0912**	**1.9000e-004**	**0.0448**	**6.3300e-003**	**0.0511**	**0.0228**	**5.8200e-003**	**0.0286**	**0.0000**	**16.7253**	**16.7253**	**5.4100e-003**	**0.0000**	**16.8606**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.3100e-003	0.1421	0.0378	6.3000e-004	0.0179	1.1600e-003	0.0191	4.9300e-003	1.1100e-003	6.0400e-003	0.0000	62.8352	62.8352	3.1600e-003	9.9900e-003	65.8921
Vendor	4.0000e-005	1.3300e-003	4.7000e-004	1.0000e-005	2.0000e-004	1.0000e-005	2.1000e-004	6.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.6020	0.6020	2.0000e-005	9.0000e-005	0.6284
Worker	2.4000e-004	1.7000e-004	2.0500e-003	1.0000e-005	7.2000e-004	0.0000	7.3000e-004	1.9000e-004	0.0000	2.0000e-004	0.0000	0.5711	0.5711	2.0000e-005	2.0000e-005	0.5763
Total	**2.5900e-003**	**0.1436**	**0.0403**	**6.5000e-004**	**0.0189**	**1.1700e-003**	**0.0200**	**5.1800e-003**	**1.1200e-003**	**6.3100e-003**	**0.0000**	**64.0083**	**64.0083**	**3.2000e-003**	**0.0101**	**67.0968**

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1416	0.0000	0.1416	0.0553	0.0000	0.0553	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0498	0.5177	0.4208	9.3000e-004		0.0214	0.0214		0.0197	0.0197	0.0000	81.8028	81.8028	0.0265	0.0000	82.4642
Total	**0.0498**	**0.5177**	**0.4208**	**9.3000e-004**	**0.1416**	**0.0214**	**0.1630**	**0.0553**	**0.0197**	**0.0750**	**0.0000**	**81.8028**	**81.8028**	**0.0265**	**0.0000**	**82.4642**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.9300e-003	0.4262	0.1134	1.8800e-003	0.0538	3.4900e-003	0.0573	0.0148	3.3400e-003	0.0181	0.0000	188.4756	188.4756	9.4900e-003	0.0300	197.6449
Vendor	1.1000e-004	4.0000e-003	1.4100e-003	2.0000e-005	6.0000e-004	2.0000e-005	6.2000e-004	1.7000e-004	2.0000e-005	2.0000e-004	0.0000	1.8059	1.8059	5.0000e-005	2.6000e-004	1.8852
Worker	8.1000e-004	5.6000e-004	6.8400e-003	2.0000e-005	2.4100e-003	1.0000e-005	2.4200e-003	6.4000e-004	1.0000e-005	6.5000e-004	0.0000	1.9037	1.9037	6.0000e-005	5.0000e-005	1.9209
Total	**7.8500e-003**	**0.4308**	**0.1216**	**1.9200e-003**	**0.0568**	**3.5200e-003**	**0.0603**	**0.0156**	**3.3700e-003**	**0.0190**	**0.0000**	**192.1852**	**192.1852**	**9.6000e-003**	**0.0303**	**201.4510**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0637	0.0000	0.0637	0.0249	0.0000	0.0249	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0498	0.5177	0.4208	9.3000e-004		0.0214	0.0214		0.0197	0.0197	0.0000	81.8027	81.8027	0.0265	0.0000	82.4641
Total	**0.0498**	**0.5177**	**0.4208**	**9.3000e-004**	**0.0637**	**0.0214**	**0.0851**	**0.0249**	**0.0197**	**0.0446**	**0.0000**	**81.8027**	**81.8027**	**0.0265**	**0.0000**	**82.4641**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.9300e-003	0.4262	0.1134	1.8800e-003	0.0538	3.4900e-003	0.0573	0.0148	3.3400e-003	0.0181	0.0000	188.4756	188.4756	9.4900e-003	0.0300	197.6449
Vendor	1.1000e-004	4.0000e-003	1.4100e-003	2.0000e-005	6.0000e-004	2.0000e-005	6.2000e-004	1.7000e-004	2.0000e-005	2.0000e-004	0.0000	1.8059	1.8059	5.0000e-005	2.6000e-004	1.8852
Worker	8.1000e-004	5.6000e-004	6.8400e-003	2.0000e-005	2.4100e-003	1.0000e-005	2.4200e-003	6.4000e-004	1.0000e-005	6.5000e-004	0.0000	1.9037	1.9037	6.0000e-005	5.0000e-005	1.9209
Total	**7.8500e-003**	**0.4308**	**0.1216**	**1.9200e-003**	**0.0568**	**3.5200e-003**	**0.0603**	**0.0156**	**3.3700e-003**	**0.0190**	**0.0000**	**192.1852**	**192.1852**	**9.6000e-003**	**0.0303**	**201.4510**

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0865	0.7912	0.8934	1.4800e-003		0.0385	0.0385		0.0362	0.0362	0.0000	127.4926	127.4926	0.0303	0.0000	128.2508
Total	**0.0865**	**0.7912**	**0.8934**	**1.4800e-003**		**0.0385**	**0.0385**		**0.0362**	**0.0362**	**0.0000**	**127.4926**	**127.4926**	**0.0303**	**0.0000**	**128.2508**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.2300e-003	0.1221	0.0431	5.6000e-004	0.0183	7.2000e-004	0.0190	5.2700e-003	6.9000e-004	5.9600e-003	0.0000	55.1789	55.1789	1.6700e-003	8.0000e-003	57.6032
Worker	0.0202	0.0140	0.1705	5.2000e-004	0.0600	3.3000e-004	0.0603	0.0159	3.0000e-004	0.0162	0.0000	47.4650	47.4650	1.4100e-003	1.3200e-003	47.8948
Total	**0.0235**	**0.1361**	**0.2135**	**1.0800e-003**	**0.0782**	**1.0500e-003**	**0.0793**	**0.0212**	**9.9000e-004**	**0.0222**	**0.0000**	**102.6439**	**102.6439**	**3.0800e-003**	**9.3200e-003**	**105.4980**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0865	0.7912	0.8934	1.4800e-003		0.0385	0.0385		0.0362	0.0362	0.0000	127.4925	127.4925	0.0303	0.0000	128.2507
Total	**0.0865**	**0.7912**	**0.8934**	**1.4800e-003**		**0.0385**	**0.0385**		**0.0362**	**0.0362**	**0.0000**	**127.4925**	**127.4925**	**0.0303**	**0.0000**	**128.2507**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.2300e-003	0.1221	0.0431	5.6000e-004	0.0183	7.2000e-004	0.0190	5.2700e-003	6.9000e-004	5.9600e-003	0.0000	55.1789	55.1789	1.6700e-003	8.0000e-003	57.6032
Worker	0.0202	0.0140	0.1705	5.2000e-004	0.0600	3.3000e-004	0.0603	0.0159	3.0000e-004	0.0162	0.0000	47.4650	47.4650	1.4100e-003	1.3200e-003	47.8948
Total	**0.0235**	**0.1361**	**0.2135**	**1.0800e-003**	**0.0782**	**1.0500e-003**	**0.0793**	**0.0212**	**9.9000e-004**	**0.0222**	**0.0000**	**102.6439**	**102.6439**	**3.0800e-003**	**9.3200e-003**	**105.4980**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1398	1.2772	1.5359	2.5600e-003		0.0583	0.0583		0.0548	0.0548	0.0000	220.2567	220.2567	0.0521	0.0000	221.5588
Total	**0.1398**	**1.2772**	**1.5359**	**2.5600e-003**		**0.0583**	**0.0583**		**0.0548**	**0.0548**	**0.0000**	**220.2567**	**220.2567**	**0.0521**	**0.0000**	**221.5588**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.3600e-003	0.2094	0.0727	9.5000e-004	0.0315	1.2500e-003	0.0328	9.1100e-003	1.1900e-003	0.0103	0.0000	93.6489	93.6489	2.9500e-003	0.0136	97.7658
Worker	0.0328	0.0217	0.2751	8.6000e-004	0.1036	5.4000e-004	0.1042	0.0275	5.0000e-004	0.0280	0.0000	79.3002	79.3002	2.2200e-003	2.1400e-003	79.9924
Total	**0.0382**	**0.2312**	**0.3477**	**1.8100e-003**	**0.1352**	**1.7900e-003**	**0.1369**	**0.0366**	**1.6900e-003**	**0.0383**	**0.0000**	**172.9491**	**172.9491**	**5.1700e-003**	**0.0157**	**177.7582**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1398	1.2772	1.5359	2.5600e-003		0.0583	0.0583		0.0548	0.0548	0.0000	220.2564	220.2564	0.0521	0.0000	221.5585
Total	**0.1398**	**1.2772**	**1.5359**	**2.5600e-003**		**0.0583**	**0.0583**		**0.0548**	**0.0548**	**0.0000**	**220.2564**	**220.2564**	**0.0521**	**0.0000**	**221.5585**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.3600e-003	0.2094	0.0727	9.5000e-004	0.0315	1.2500e-003	0.0328	9.1100e-003	1.1900e-003	0.0103	0.0000	93.6489	93.6489	2.9500e-003	0.0136	97.7658
Worker	0.0328	0.0217	0.2751	8.6000e-004	0.1036	5.4000e-004	0.1042	0.0275	5.0000e-004	0.0280	0.0000	79.3002	79.3002	2.2200e-003	2.1400e-003	79.9924
Total	**0.0382**	**0.2312**	**0.3477**	**1.8100e-003**	**0.1352**	**1.7900e-003**	**0.1369**	**0.0366**	**1.6900e-003**	**0.0383**	**0.0000**	**172.9491**	**172.9491**	**5.1700e-003**	**0.0157**	**177.7582**

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.8800e-003	0.0953	0.1463	2.3000e-004		4.6900e-003	4.6900e-003		4.3100e-003	4.3100e-003	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1885
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.8800e-003**	**0.0953**	**0.1463**	**2.3000e-004**		**4.6900e-003**	**4.6900e-003**		**4.3100e-003**	**4.3100e-003**	**0.0000**	**20.0265**	**20.0265**	**6.4800e-003**	**0.0000**	**20.1885**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	4.1000e-004	2.7000e-004	3.4100e-003	1.0000e-005	1.2800e-003	1.0000e-005	1.2900e-003	3.4000e-004	1.0000e-005	3.5000e-004	0.0000	0.9821	0.9821	3.0000e-005	3.0000e-005	0.9906
Total	**4.8000e-004**	**2.9200e-003**	**4.3300e-003**	**2.0000e-005**	**1.6800e-003**	**3.0000e-005**	**1.7000e-003**	**4.6000e-004**	**3.0000e-005**	**4.8000e-004**	**0.0000**	**2.1650**	**2.1650**	**7.0000e-005**	**2.0000e-004**	**2.2256**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.8800e-003	0.0953	0.1463	2.3000e-004		4.6900e-003	4.6900e-003		4.3100e-003	4.3100e-003	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1884
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.8800e-003**	**0.0953**	**0.1463**	**2.3000e-004**		**4.6900e-003**	**4.6900e-003**		**4.3100e-003**	**4.3100e-003**	**0.0000**	**20.0265**	**20.0265**	**6.4800e-003**	**0.0000**	**20.1884**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	4.1000e-004	2.7000e-004	3.4100e-003	1.0000e-005	1.2800e-003	1.0000e-005	1.2900e-003	3.4000e-004	1.0000e-005	3.5000e-004	0.0000	0.9821	0.9821	3.0000e-005	3.0000e-005	0.9906
Total	**4.8000e-004**	**2.9200e-003**	**4.3300e-003**	**2.0000e-005**	**1.6800e-003**	**3.0000e-005**	**1.7000e-003**	**4.6000e-004**	**3.0000e-005**	**4.8000e-004**	**0.0000**	**2.1650**	**2.1650**	**7.0000e-005**	**2.0000e-004**	**2.2256**

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	2.4410					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.8100e-003	0.0122	0.0181	3.0000e-005		6.1000e-004	6.1000e-004		6.1000e-004	6.1000e-004	0.0000	2.5533	2.5533	1.4000e-004	0.0000	2.5569
Total	**2.4428**	**0.0122**	**0.0181**	**3.0000e-005**		**6.1000e-004**	**6.1000e-004**		**6.1000e-004**	**6.1000e-004**	**0.0000**	**2.5533**	**2.5533**	**1.4000e-004**	**0.0000**	**2.5569**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	7.1000e-004	4.7000e-004	5.9600e-003	2.0000e-005	2.2500e-003	1.0000e-005	2.2600e-003	6.0000e-004	1.0000e-005	6.1000e-004	0.0000	1.7186	1.7186	5.0000e-005	5.0000e-005	1.7336
Total	**7.8000e-004**	**3.1200e-003**	**6.8800e-003**	**3.0000e-005**	**2.6500e-003**	**3.0000e-005**	**2.6700e-003**	**7.2000e-004**	**3.0000e-005**	**7.4000e-004**	**0.0000**	**2.9015**	**2.9015**	**9.0000e-005**	**2.2000e-004**	**2.9685**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	2.4410					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.8100e-003	0.0122	0.0181	3.0000e-005		6.1000e-004	6.1000e-004		6.1000e-004	6.1000e-004	0.0000	2.5533	2.5533	1.4000e-004	0.0000	2.5568
Total	**2.4428**	**0.0122**	**0.0181**	**3.0000e-005**		**6.1000e-004**	**6.1000e-004**		**6.1000e-004**	**6.1000e-004**	**0.0000**	**2.5533**	**2.5533**	**1.4000e-004**	**0.0000**	**2.5568**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	7.1000e-004	4.7000e-004	5.9600e-003	2.0000e-005	2.2500e-003	1.0000e-005	2.2600e-003	6.0000e-004	1.0000e-005	6.1000e-004	0.0000	1.7186	1.7186	5.0000e-005	5.0000e-005	1.7336
Total	**7.8000e-004**	**3.1200e-003**	**6.8800e-003**	**3.0000e-005**	**2.6500e-003**	**3.0000e-005**	**2.6700e-003**	**7.2000e-004**	**3.0000e-005**	**7.4000e-004**	**0.0000**	**2.9015**	**2.9015**	**9.0000e-005**	**2.2000e-004**	**2.9685**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4013	0.4464	3.7635	8.0200e-003	6.8753	6.2200e-003	6.8816	0.8313	5.8000e-003	0.8371	0.0000	742.1157	742.1157	0.0530	0.0337	753.4747
Unmitigated	0.4013	0.4464	3.7635	8.0200e-003	6.8753	6.2200e-003	6.8816	0.8313	5.8000e-003	0.8371	0.0000	742.1157	742.1157	0.0530	0.0337	753.4747

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Single Family Housing	840.00	849.24	761.04	2,370,016	2,370,016
Total	840.00	849.24	761.04	2,370,016	2,370,016

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	7.30	7.50	41.60	18.80	39.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Other Non-Asphalt Surfaces	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Single Family Housing	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	163.8664	163.8664	0.0100	1.2100e-003	164.4785
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	163.8664	163.8664	0.0100	1.2100e-003	164.4785
NaturalGas Mitigated	0.0128	0.1095	0.0466	7.0000e-004		8.8500e-003	8.8500e-003		8.8500e-003	8.8500e-003	0.0000	126.7979	126.7979	2.4300e-003	2.3200e-003	127.5514
NaturalGas Unmitigated	0.0128	0.1095	0.0466	7.0000e-004		8.8500e-003	8.8500e-003		8.8500e-003	8.8500e-003	0.0000	126.7979	126.7979	2.4300e-003	2.3200e-003	127.5514

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	2.3761e+006	0.0128	0.1095	0.0466	7.0000e-004		8.8500e-003	8.8500e-003		8.8500e-003	8.8500e-003	0.0000	126.7979	126.7979	2.4300e-003	2.3200e-003	127.5514
Total		**0.0128**	**0.1095**	**0.0466**	**7.0000e-004**		**8.8500e-003**	**8.8500e-003**		**8.8500e-003**	**8.8500e-003**	**0.0000**	**126.7979**	**126.7979**	**2.4300e-003**	**2.3200e-003**	**127.5514**

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	2.3761e+006	0.0128	0.1095	0.0466	7.0000e-004		8.8500e-003	8.8500e-003		8.8500e-003	8.8500e-003	0.0000	126.7979	126.7979	2.4300e-003	2.3200e-003	127.5514
Total		**0.0128**	**0.1095**	**0.0466**	**7.0000e-004**		**8.8500e-003**	**8.8500e-003**		**8.8500e-003**	**8.8500e-003**	**0.0000**	**126.7979**	**126.7979**	**2.4300e-003**	**2.3200e-003**	**127.5514**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	669031	163.8664	0.0100	1.2100e-003	164.4785
Total		**163.8664**	**0.0100**	**1.2100e-003**	**164.4785**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	669031	163.8664	0.0100	1.2100e-003	164.4785
Total		**163.8664**	**0.0100**	**1.2100e-003**	**164.4785**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	6.2860	0.1101	7.1293	0.0118		0.9157	0.9157		0.9157	0.9157	86.7685	37.4083	124.1768	0.0811	6.8200e-003	128.2369
Unmitigated	6.2860	0.1101	7.1293	0.0118		0.9157	0.9157		0.9157	0.9157	86.7685	37.4083	124.1768	0.0811	6.8200e-003	128.2369

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2441					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.7525					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	5.2707	0.1029	6.5061	0.0118		0.9122	0.9122		0.9122	0.9122	86.7685	36.3894	123.1579	0.0801	6.8200e-003	127.1935
Landscaping	0.0187	7.1800e-003	0.6232	3.0000e-005		3.4600e-003	3.4600e-003		3.4600e-003	3.4600e-003	0.0000	1.0189	1.0189	9.8000e-004	0.0000	1.0433
Total	**6.2860**	**0.1101**	**7.1293**	**0.0118**		**0.9157**	**0.9157**		**0.9157**	**0.9157**	**86.7685**	**37.4083**	**124.1768**	**0.0811**	**6.8200e-003**	**128.2369**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2441					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.7525					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	5.2707	0.1029	6.5061	0.0118		0.9122	0.9122		0.9122	0.9122	86.7685	36.3894	123.1579	0.0801	6.8200e-003	127.1935
Landscaping	0.0187	7.1800e-003	0.6232	3.0000e-005		3.4600e-003	3.4600e-003		3.4600e-003	3.4600e-003	0.0000	1.0189	1.0189	9.8000e-004	0.0000	1.0433
Total	**6.2860**	**0.1101**	**7.1293**	**0.0118**		**0.9157**	**0.9157**		**0.9157**	**0.9157**	**86.7685**	**37.4083**	**124.1768**	**0.0811**	**6.8200e-003**	**128.2369**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	31.1412	0.1801	4.4300e-003	36.9643
Unmitigated	31.1412	0.1801	4.4300e-003	36.9643

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.94127	2.5614	1.6000e-004	2.0000e-005	2.5709
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	5.47294 / 3.45033	28.5798	0.1800	4.4100e-003	34.3933
Total		**31.1412**	**0.1801**	**4.4300e-003**	**36.9643**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.94127	2.5614	1.6000e-004	2.0000e-005	2.5709
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	5.47294 / 3.45033	28.5798	0.1800	4.4100e-003	34.3933
Total		**31.1412**	**0.1801**	**4.4300e-003**	**36.9643**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Guajome Lake Road Residential - Unmitigated - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	19.9885	1.1813	0.0000	49.5207
Unmitigated	19.9885	1.1813	0.0000	49.5207

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.07	0.0142	8.4000e-004	0.0000	0.0352
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	98.4	19.9743	1.1805	0.0000	49.4855
Total		**19.9885**	**1.1813**	**0.0000**	**49.5207**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.07	0.0142	8.4000e-004	0.0000	0.0352
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	98.4	19.9743	1.1805	0.0000	49.4855
Total		**19.9885**	**1.1813**	**0.0000**	**49.5207**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Guajome Lake Road Residential

San Diego County APCD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	5.00	Acre	5.00	217,800.00	0
City Park	0.79	Acre	0.79	34,391.00	0
Single Family Housing	83.00	Dwelling Unit	10.99	186,750.00	237

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	10			**Operational Year**	2025
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	539.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CalEEMod Defaults.

Land Use - See Project Description.

Construction Phase - CalEEMod defaults.

Trips and VMT - Trips Modified to round up odd one way trips.

Grading - 67,000 CY of export.

Architectural Coating - per MM-AQ-1

Vehicle Trips - Trip genreation rates updated to be consistient with traffic analysis.

Road Dust - 800 feet of travel on unpaved road on 50% of the trips entering or exiting the Project site.

Woodstoves - No Wood Fireplaces per MM-AQ-2

Energy Use - CalEEMod Defaults.

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Construction Off-road Equipment Mitigation - Complinace with SDACPD Rules per PDF-AQ-1.

Mobile Land Use Mitigation - No Mitigation Applied.

Mobile Commute Mitigation - No Mitigation Applied.

Area Mitigation - No Mitigation Applied.

Energy Mitigation - No Mitigation Applied.

Water Mitigation - No Mitigation Applied.

Waste Mitigation - No Mitigation Applied.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Residential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Residential_Interior	250.00	50.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblFireplaces	NumberGas	45.65	0.00
tblFireplaces	NumberWood	29.05	0.00
tblGrading	MaterialExported	0.00	50,250.00
tblGrading	MaterialExported	0.00	16,750.00
tblLandUse	LandUseSquareFeet	34,412.40	34,391.00
tblLandUse	LandUseSquareFeet	149,400.00	186,750.00
tblLandUse	LotAcreage	26.95	10.99
tblRoadDust	MeanVehicleSpeed	40	25
tblRoadDust	RoadPercentPave	100	99.14
tblTripsAndVMT	HaulingTripNumber	6,281.00	6,282.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	15.00	16.00
tblTripsAndVMT	WorkerTripNumber	27.00	28.00
tblVehicleTrips	ST_TR	1.96	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	ST_TR	9.54	10.11
tblVehicleTrips	SU_TR	2.19	0.00
tblVehicleTrips	SU_TR	8.55	9.06
tblVehicleTrips	WD_TR	0.78	0.00
tblVehicleTrips	WD_TR	9.44	10.00
tblWoodstoves	NumberCatalytic	4.15	0.00
tblWoodstoves	NumberNoncatalytic	4.15	0.00

2.0 Emissions Summary

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8338	63.3191	36.2213	0.1901	23.7433	1.6599	25.2447	11.1929	1.5357	12.5827	0.0000	20,143.5655	20,143.5655	2.6487	2.2275	20,873.5726
2024	66.2639	15.8957	19.8435	0.0460	1.4559	0.6322	2.0880	0.3938	0.5948	0.9886	0.0000	4,555.3325	4,555.3325	0.7212	0.1827	4,626.4037
Maximum	**66.2639**	**63.3191**	**36.2213**	**0.1901**	**23.7433**	**1.6599**	**25.2447**	**11.1929**	**1.5357**	**12.5827**	**0.0000**	**20,143.5655**	**20,143.5655**	**2.6487**	**2.2275**	**20,873.5726**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8338	63.3191	36.2213	0.1901	12.8025	1.6599	14.3038	5.6169	1.5357	7.0068	0.0000	20,143.5655	20,143.5655	2.6487	2.2275	20,873.5725
2024	66.2639	15.8957	19.8435	0.0460	1.4559	0.6322	2.0880	0.3938	0.5948	0.9886	0.0000	4,555.3325	4,555.3325	0.7212	0.1827	4,626.4037
Maximum	**66.2639**	**63.3191**	**36.2213**	**0.1901**	**12.8025**	**1.6599**	**14.3038**	**5.6169**	**1.5357**	**7.0068**	**0.0000**	**20,143.5655**	**20,143.5655**	**2.6487**	**2.2275**	**20,873.5725**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	43.42	0.00	40.03	48.12	0.00	41.09	0.00	0.00	0.00	0.00	0.00	0.00

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264
Energy	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Mobile	2.2704	2.5075	21.3319	0.0443	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,518.8127	4,518.8127	0.3306	0.2082	4,589.1347
Total	**8.2628**	**3.1791**	**28.4258**	**0.0485**	**38.3084**	**0.1205**	**38.4289**	**4.6468**	**0.1182**	**4.7650**	**0.0000**	**5,287.8935**	**5,287.8935**	**0.3569**	**0.2221**	**5,363.0078**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264
Energy	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Mobile	2.2704	2.5075	21.3319	0.0443	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,518.8127	4,518.8127	0.3306	0.2082	4,589.1347
Total	**8.2628**	**3.1791**	**28.4258**	**0.0485**	**38.3084**	**0.1205**	**38.4289**	**4.6468**	**0.1182**	**4.7650**	**0.0000**	**5,287.8935**	**5,287.8935**	**0.3569**	**0.2221**	**5,363.0078**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	7/1/2023	7/14/2023	5	10	
2	Grading	Grading	7/15/2023	8/25/2023	5	30	
3	Building Construction	Building Construction	8/26/2023	10/18/2024	5	300	
4	Paving	Paving	10/19/2024	11/15/2024	5	20	
5	Architectural Coating	Architectural Coating	11/16/2024	12/13/2024	5	20	

Acres of Grading (Site Preparation Phase): 15

Acres of Grading (Grading Phase): 90

Acres of Paving: 5

Residential Indoor: 378,169; Residential Outdoor: 126,056; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 13,068 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	6.00	2,094.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	6,282.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	136.00	50.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	16.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	28.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					19.8924	0.0000	19.8924	10.1381	0.0000	10.1381			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647		3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**19.8924**	**1.2660**	**21.1584**	**10.1381**	**1.1647**	**11.3028**		**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4458	28.4973	7.6185	0.1254	3.6625	0.2329	3.8954	1.0039	0.2229	1.2267		13,860.6033	13,860.6033	0.6962	2.2043	14,534.8836
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0533	0.0344	0.4105	1.2300e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		124.8010	124.8010	3.8100e-003	3.5600e-003	125.9573
Total	**0.5061**	**28.7997**	**8.1245**	**0.1279**	**3.8510**	**0.2353**	**4.0863**	**1.0548**	**0.2251**	**1.2799**		**14,118.2210**	**14,118.2210**	**0.7040**	**2.2271**	**14,799.4937**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.9516	0.0000	8.9516	4.5621	0.0000	4.5621			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647	0.0000	3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**8.9516**	**1.2660**	**10.2176**	**4.5621**	**1.1647**	**5.7269**	**0.0000**	**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4458	28.4973	7.6185	0.1254	3.6625	0.2329	3.8954	1.0039	0.2229	1.2267		13,860.6033	13,860.6033	0.6962	2.2043	14,534.8836
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0533	0.0344	0.4105	1.2300e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		124.8010	124.8010	3.8100e-003	3.5600e-003	125.9573
Total	**0.5061**	**28.7997**	**8.1245**	**0.1279**	**3.8510**	**0.2353**	**4.0863**	**1.0548**	**0.2251**	**1.2799**		**14,118.2210**	**14,118.2210**	**0.7040**	**2.2271**	**14,799.4937**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.4390	0.0000	9.4390	3.6894	0.0000	3.6894			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105		6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**9.4390**	**1.4245**	**10.8635**	**3.6894**	**1.3105**	**4.9999**		**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4458	28.4973	7.6185	0.1254	3.6625	0.2329	3.8954	1.0039	0.2229	1.2267		13,860.6033	13,860.6033	0.6962	2.2043	14,534.8836
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0593	0.0382	0.4561	1.3700e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		138.6678	138.6678	4.2400e-003	3.9600e-003	139.9526
Total	**0.5121**	**28.8035**	**8.1701**	**0.1280**	**3.8674**	**0.2354**	**4.1028**	**1.0592**	**0.2252**	**1.2843**		**14,132.0878**	**14,132.0878**	**0.7044**	**2.2275**	**14,813.4890**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.2475	0.0000	4.2475	1.6602	0.0000	1.6602			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**4.2475**	**1.4245**	**5.6720**	**1.6602**	**1.3105**	**2.9708**	**0.0000**	**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4458	28.4973	7.6185	0.1254	3.6625	0.2329	3.8954	1.0039	0.2229	1.2267		13,860.6033	13,860.6033	0.6962	2.2043	14,534.8836
Vendor	6.9700e-003	0.2680	0.0955	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		132.8167	132.8167	4.0000e-003	0.0193	138.6528
Worker	0.0593	0.0382	0.4561	1.3700e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		138.6678	138.6678	4.2400e-003	3.9600e-003	139.9526
Total	**0.5121**	**28.8035**	**8.1701**	**0.1280**	**3.8674**	**0.2354**	**4.1028**	**1.0592**	**0.2252**	**1.2843**		**14,132.0878**	**14,132.0878**	**0.7044**	**2.2275**	**14,813.4890**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0581	2.2336	0.7957	0.0103	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,106.8061	1,106.8061	0.0333	0.1604	1,155.4398
Worker	0.4030	0.2596	3.1014	9.3300e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		942.9409	942.9409	0.0288	0.0269	951.6775
Total	**0.4611**	**2.4931**	**3.8972**	**0.0196**	**1.4558**	**0.0191**	**1.4750**	**0.3938**	**0.0181**	**0.4119**		**2,049.7470**	**2,049.7470**	**0.0621**	**0.1873**	**2,107.1173**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0581	2.2336	0.7957	0.0103	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,106.8061	1,106.8061	0.0333	0.1604	1,155.4398
Worker	0.4030	0.2596	3.1014	9.3300e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		942.9409	942.9409	0.0288	0.0269	951.6775
Total	**0.4611**	**2.4931**	**3.8972**	**0.0196**	**1.4558**	**0.0191**	**1.4750**	**0.3938**	**0.0181**	**0.4119**		**2,049.7470**	**2,049.7470**	**0.0621**	**0.1873**	**2,107.1173**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0558	2.2185	0.7776	0.0101	0.3386	0.0132	0.3518	0.0975	0.0126	0.1101		1,087.5534	1,087.5534	0.0341	0.1576	1,135.3692
Worker	0.3794	0.2334	2.8991	9.0200e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		912.0802	912.0802	0.0263	0.0251	920.2269
Total	**0.4351**	**2.4519**	**3.6766**	**0.0191**	**1.4559**	**0.0189**	**1.4747**	**0.3938**	**0.0179**	**0.4117**		**1,999.6336**	**1,999.6336**	**0.0604**	**0.1827**	**2,055.5961**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0558	2.2185	0.7776	0.0101	0.3386	0.0132	0.3518	0.0975	0.0126	0.1101		1,087.5534	1,087.5534	0.0341	0.1576	1,135.3692
Worker	0.3794	0.2334	2.8991	9.0200e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		912.0802	912.0802	0.0263	0.0251	920.2269
Total	**0.4351**	**2.4519**	**3.6766**	**0.0191**	**1.4559**	**0.0189**	**1.4747**	**0.3938**	**0.0179**	**0.4117**		**1,999.6336**	**1,999.6336**	**0.0604**	**0.1827**	**2,055.5961**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0446	0.0275	0.3411	1.0600e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		107.3036	107.3036	3.0900e-003	2.9600e-003	108.2620
Total	**0.0513**	**0.2937**	**0.4344**	**2.2700e-003**	**0.1721**	**2.2500e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**237.8100**	**237.8100**	**7.1800e-003**	**0.0219**	**244.5063**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0446	0.0275	0.3411	1.0600e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		107.3036	107.3036	3.0900e-003	2.9600e-003	108.2620
Total	**0.0513**	**0.2937**	**0.4344**	**2.2700e-003**	**0.1721**	**2.2500e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**237.8100**	**237.8100**	**7.1800e-003**	**0.0219**	**244.5063**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	65.9983					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**66.1791**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0781	0.0481	0.5969	1.8600e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		187.7812	187.7812	5.4100e-003	5.1700e-003	189.4585
Total	**0.0848**	**0.3143**	**0.6902**	**3.0700e-003**	**0.2707**	**2.7500e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**318.2876**	**318.2876**	**9.5000e-003**	**0.0241**	**325.7028**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	65.9983					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**66.1791**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.6900e-003	0.2662	0.0933	1.2100e-003	0.0406	1.5800e-003	0.0422	0.0117	1.5100e-003	0.0132		130.5064	130.5064	4.0900e-003	0.0189	136.2443
Worker	0.0781	0.0481	0.5969	1.8600e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		187.7812	187.7812	5.4100e-003	5.1700e-003	189.4585
Total	**0.0848**	**0.3143**	**0.6902**	**3.0700e-003**	**0.2707**	**2.7500e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**318.2876**	**318.2876**	**9.5000e-003**	**0.0241**	**325.7028**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.2704	2.5075	21.3319	0.0443	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,518.8127	4,518.8127	0.3306	0.2082	4,589.1347
Unmitigated	2.2704	2.5075	21.3319	0.0443	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,518.8127	4,518.8127	0.3306	0.2082	4,589.1347

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Single Family Housing	830.00	839.13	751.98	2,341,802	2,341,802
Total	830.00	839.13	751.98	2,341,802	2,341,802

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	7.30	7.50	41.60	18.80	39.60	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Other Non-Asphalt Surfaces	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Single Family Housing	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
NaturalGas Unmitigated	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6432.37	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Total		**0.0694**	**0.5928**	**0.2523**	**3.7800e-003**		**0.0479**	**0.0479**		**0.0479**	**0.0479**		**756.7497**	**756.7497**	**0.0145**	**0.0139**	**761.2467**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6.43237	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Total		**0.0694**	**0.5928**	**0.2523**	**3.7800e-003**		**0.0479**	**0.0479**		**0.0479**	**0.0479**		**756.7497**	**756.7497**	**0.0145**	**0.0139**	**761.2467**

6.0 Area Detail

6.1 Mitigation Measures Area

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264
Unmitigated	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.6422					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.0754					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2055	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380		12.3311	12.3311	0.0118		12.6264
Total	**5.9231**	**0.0788**	**6.8417**	**3.6000e-004**		**0.0380**	**0.0380**		**0.0380**	**0.0380**	**0.0000**	**12.3311**	**12.3311**	**0.0118**	**0.0000**	**12.6264**

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.6422					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.0754					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2055	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380		12.3311	12.3311	0.0118		12.6264
Total	**5.9231**	**0.0788**	**6.8417**	**3.6000e-004**		**0.0380**	**0.0380**		**0.0380**	**0.0380**	**0.0000**	**12.3311**	**12.3311**	**0.0118**	**0.0000**	**12.6264**

7.0 Water Detail

7.1 Mitigation Measures Water

Guajome Lake Road Residential - San Diego County APCD Air District, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Guajome Lake Road Residential

San Diego County APCD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	5.00	Acre	5.00	217,800.00	0
City Park	0.79	Acre	0.79	34,391.00	0
Single Family Housing	83.00	Dwelling Unit	10.99	186,750.00	237

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	10			**Operational Year**	2025
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	539.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CalEEMod Defaults.

Land Use - See Project Description.

Construction Phase - CalEEMod defaults.

Trips and VMT - Trips Modified to round up odd one way trips.

Grading - 67,000 CY of export.

Architectural Coating - per MM-AQ-1

Vehicle Trips - Trip genreation rates updated to be consistient with traffic analysis.

Road Dust - 800 feet of travel on unpaved road on 50% of the trips entering or exiting the Project site.

Woodstoves - No Wood Fireplaces per MM-AQ-2

Energy Use - CalEEMod Defaults.

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Construction Off-road Equipment Mitigation - Complinace with SDACPD Rules per PDF-AQ-1.

Mobile Land Use Mitigation - No Mitigation Applied.

Mobile Commute Mitigation - No Mitigation Applied.

Area Mitigation - No Mitigation Applied.

Energy Mitigation - No Mitigation Applied.

Water Mitigation - No Mitigation Applied.

Waste Mitigation - No Mitigation Applied.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Residential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Residential_Interior	250.00	50.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblFireplaces	NumberGas	45.65	0.00
tblFireplaces	NumberWood	29.05	0.00
tblGrading	MaterialExported	0.00	50,250.00
tblGrading	MaterialExported	0.00	16,750.00
tblLandUse	LandUseSquareFeet	34,412.40	34,391.00
tblLandUse	LandUseSquareFeet	149,400.00	186,750.00
tblLandUse	LotAcreage	26.95	10.99
tblRoadDust	MeanVehicleSpeed	40	25
tblRoadDust	RoadPercentPave	100	99.14
tblTripsAndVMT	HaulingTripNumber	6,281.00	6,282.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	15.00	16.00
tblTripsAndVMT	WorkerTripNumber	27.00	28.00
tblVehicleTrips	ST_TR	1.96	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	ST_TR	9.54	10.11
tblVehicleTrips	SU_TR	2.19	0.00
tblVehicleTrips	SU_TR	8.55	9.06
tblVehicleTrips	WD_TR	0.78	0.00
tblVehicleTrips	WD_TR	9.44	10.00
tblWoodstoves	NumberCatalytic	4.15	0.00
tblWoodstoves	NumberNoncatalytic	4.15	0.00

2.0 Emissions Summary

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8578	62.1993	36.1486	0.1901	23.7433	1.6594	25.2442	11.1929	1.5353	12.5823	0.0000	20,137.9862	20,137.9862	2.6501	2.2249	20,867.2626
2024	66.2579	15.7801	19.9661	0.0466	1.4559	0.6321	2.0880	0.3938	0.5947	0.9885	0.0000	4,606.6641	4,606.6641	0.7210	0.1805	4,677.0262
Maximum	**66.2579**	**62.1993**	**36.1486**	**0.1901**	**23.7433**	**1.6594**	**25.2442**	**11.1929**	**1.5353**	**12.5823**	**0.0000**	**20,137.9862**	**20,137.9862**	**2.6501**	**2.2249**	**20,867.2626**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	3.8578	62.1993	36.1486	0.1901	12.8025	1.6594	14.3034	5.6169	1.5353	7.0063	0.0000	20,137.9862	20,137.9862	2.6501	2.2249	20,867.2626
2024	66.2579	15.7801	19.9661	0.0466	1.4559	0.6321	2.0880	0.3938	0.5947	0.9885	0.0000	4,606.6641	4,606.6641	0.7210	0.1805	4,677.0262
Maximum	**66.2579**	**62.1993**	**36.1486**	**0.1901**	**12.8025**	**1.6594**	**14.3034**	**5.6169**	**1.5353**	**7.0063**	**0.0000**	**20,137.9862**	**20,137.9862**	**2.6501**	**2.2249**	**20,867.2626**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	43.42	0.00	40.03	48.12	0.00	41.09	0.00	0.00	0.00	0.00	0.00	0.00

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264
Energy	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Mobile	2.3252	2.3148	20.7867	0.0464	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,722.8255	4,722.8255	0.3131	0.1978	4,789.6036
Total	**8.3176**	**2.9864**	**27.8807**	**0.0505**	**38.3084**	**0.1205**	**38.4289**	**4.6468**	**0.1182**	**4.7650**	**0.0000**	**5,491.9063**	**5,491.9063**	**0.3394**	**0.2117**	**5,563.4766**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264
Energy	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Mobile	2.3252	2.3148	20.7867	0.0464	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,722.8255	4,722.8255	0.3131	0.1978	4,789.6036
Total	**8.3176**	**2.9864**	**27.8807**	**0.0505**	**38.3084**	**0.1205**	**38.4289**	**4.6468**	**0.1182**	**4.7650**	**0.0000**	**5,491.9063**	**5,491.9063**	**0.3394**	**0.2117**	**5,563.4766**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	7/1/2023	7/14/2023	5	10	
2	Grading	Grading	7/15/2023	8/25/2023	5	30	
3	Building Construction	Building Construction	8/26/2023	10/18/2024	5	300	
4	Paving	Paving	10/19/2024	11/15/2024	5	20	
5	Architectural Coating	Architectural Coating	11/16/2024	12/13/2024	5	20	

Acres of Grading (Site Preparation Phase): 15

Acres of Grading (Grading Phase): 90

Acres of Paving: 5

Residential Indoor: 378,169; Residential Outdoor: 126,056; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 13,068 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	6.00	2,094.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	6,282.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	136.00	50.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	16.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	28.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					19.8924	0.0000	19.8924	10.1381	0.0000	10.1381			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647		3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**19.8924**	**1.2660**	**21.1584**	**10.1381**	**1.1647**	**11.3028**		**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4742	27.3925	7.5248	0.1253	3.6625	0.2325	3.8949	1.0039	0.2224	1.2263		13,847.1475	13,847.1475	0.6979	2.2021	14,520.8055
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0492	0.0306	0.4320	1.3100e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		132.0595	132.0595	3.5800e-003	3.2900e-003	133.1300
Total	**0.5306**	**27.6803**	**8.0494**	**0.1278**	**3.8510**	**0.2348**	**4.0858**	**1.0548**	**0.2247**	**1.2795**		**14,111.8352**	**14,111.8352**	**0.7055**	**2.2245**	**14,792.3868**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.9516	0.0000	8.9516	4.5621	0.0000	4.5621			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647	0.0000	3,687.3081	3,687.3081	1.1926		3,717.1219
Total	**2.6595**	**27.5242**	**18.2443**	**0.0381**	**8.9516**	**1.2660**	**10.2176**	**4.5621**	**1.1647**	**5.7269**	**0.0000**	**3,687.3081**	**3,687.3081**	**1.1926**		**3,717.1219**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4742	27.3925	7.5248	0.1253	3.6625	0.2325	3.8949	1.0039	0.2224	1.2263		13,847.1475	13,847.1475	0.6979	2.2021	14,520.8055
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0492	0.0306	0.4320	1.3100e-003	0.1479	7.9000e-004	0.1487	0.0392	7.3000e-004	0.0400		132.0595	132.0595	3.5800e-003	3.2900e-003	133.1300
Total	**0.5306**	**27.6803**	**8.0494**	**0.1278**	**3.8510**	**0.2348**	**4.0858**	**1.0548**	**0.2247**	**1.2795**		**14,111.8352**	**14,111.8352**	**0.7055**	**2.2245**	**14,792.3868**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.4390	0.0000	9.4390	3.6894	0.0000	3.6894			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105		6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**9.4390**	**1.4245**	**10.8635**	**3.6894**	**1.3105**	**4.9999**		**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4742	27.3925	7.5248	0.1253	3.6625	0.2325	3.8949	1.0039	0.2224	1.2263		13,847.1475	13,847.1475	0.6979	2.2021	14,520.8055
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0547	0.0339	0.4800	1.4500e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		146.7328	146.7328	3.9800e-003	3.6600e-003	147.9223
Total	**0.5361**	**27.6837**	**8.0974**	**0.1280**	**3.8674**	**0.2349**	**4.1023**	**1.0592**	**0.2247**	**1.2839**		**14,126.5085**	**14,126.5085**	**0.7059**	**2.2249**	**14,807.1790**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.2475	0.0000	4.2475	1.6602	0.0000	1.6602			0.0000			0.0000
Off-Road	3.3217	34.5156	28.0512	0.0621		1.4245	1.4245		1.3105	1.3105	0.0000	6,011.4777	6,011.4777	1.9442		6,060.0836
Total	**3.3217**	**34.5156**	**28.0512**	**0.0621**	**4.2475**	**1.4245**	**5.6720**	**1.6602**	**1.3105**	**2.9708**	**0.0000**	**6,011.4777**	**6,011.4777**	**1.9442**		**6,060.0836**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4742	27.3925	7.5248	0.1253	3.6625	0.2325	3.8949	1.0039	0.2224	1.2263		13,847.1475	13,847.1475	0.6979	2.2021	14,520.8055
Vendor	7.1700e-003	0.2572	0.0927	1.2300e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5000e-003	0.0132		132.6282	132.6282	4.0200e-003	0.0192	138.4513
Worker	0.0547	0.0339	0.4800	1.4500e-003	0.1643	8.8000e-004	0.1652	0.0436	8.1000e-004	0.0444		146.7328	146.7328	3.9800e-003	3.6600e-003	147.9223
Total	**0.5361**	**27.6837**	**8.0974**	**0.1280**	**3.8674**	**0.2349**	**4.1023**	**1.0592**	**0.2247**	**1.2839**		**14,126.5085**	**14,126.5085**	**0.7059**	**2.2249**	**14,807.1790**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0597	2.1434	0.7724	0.0102	0.3386	0.0131	0.3517	0.0975	0.0125	0.1100		1,105.2348	1,105.2348	0.0335	0.1600	1,153.7610
Worker	0.3717	0.2308	3.2639	9.8700e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		997.7831	997.7831	0.0270	0.0249	1,005.8713
Total	**0.4314**	**2.3742**	**4.0363**	**0.0201**	**1.4558**	**0.0191**	**1.4749**	**0.3938**	**0.0180**	**0.4118**		**2,103.0179**	**2,103.0179**	**0.0605**	**0.1849**	**2,159.6323**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0597	2.1434	0.7724	0.0102	0.3386	0.0131	0.3517	0.0975	0.0125	0.1100		1,105.2348	1,105.2348	0.0335	0.1600	1,153.7610
Worker	0.3717	0.2308	3.2639	9.8700e-003	1.1172	5.9900e-003	1.1232	0.2963	5.5200e-003	0.3019		997.7831	997.7831	0.0270	0.0249	1,005.8713
Total	**0.4314**	**2.3742**	**4.0363**	**0.0201**	**1.4558**	**0.0191**	**1.4749**	**0.3938**	**0.0180**	**0.4118**		**2,103.0179**	**2,103.0179**	**0.0605**	**0.1849**	**2,159.6323**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0575	2.1288	0.7544	0.0101	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,085.9653	1,085.9653	0.0343	0.1572	1,133.6765
Worker	0.3490	0.2075	3.0449	9.5500e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		964.9998	964.9998	0.0246	0.0232	972.5420
Total	**0.4065**	**2.3363**	**3.7993**	**0.0196**	**1.4559**	**0.0188**	**1.4747**	**0.3938**	**0.0178**	**0.4116**		**2,050.9652**	**2,050.9652**	**0.0589**	**0.1805**	**2,106.2185**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0575	2.1288	0.7544	0.0101	0.3386	0.0131	0.3518	0.0975	0.0126	0.1100		1,085.9653	1,085.9653	0.0343	0.1572	1,133.6765
Worker	0.3490	0.2075	3.0449	9.5500e-003	1.1172	5.7000e-003	1.1229	0.2963	5.2500e-003	0.3016		964.9998	964.9998	0.0246	0.0232	972.5420
Total	**0.4065**	**2.3363**	**3.7993**	**0.0196**	**1.4559**	**0.0188**	**1.4747**	**0.3938**	**0.0178**	**0.4116**		**2,050.9652**	**2,050.9652**	**0.0589**	**0.1805**	**2,106.2185**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0411	0.0244	0.3582	1.1200e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		113.5294	113.5294	2.9000e-003	2.7300e-003	114.4167
Total	**0.0480**	**0.2799**	**0.4487**	**2.3300e-003**	**0.1721**	**2.2400e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**243.8452**	**243.8452**	**7.0100e-003**	**0.0216**	**250.4579**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0411	0.0244	0.3582	1.1200e-003	0.1314	6.7000e-004	0.1321	0.0349	6.2000e-004	0.0355		113.5294	113.5294	2.9000e-003	2.7300e-003	114.4167
Total	**0.0480**	**0.2799**	**0.4487**	**2.3300e-003**	**0.1721**	**2.2400e-003**	**0.1743**	**0.0466**	**2.1300e-003**	**0.0487**		**243.8452**	**243.8452**	**7.0100e-003**	**0.0216**	**250.4579**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	65.9983					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**66.1791**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0719	0.0427	0.6269	1.9700e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		198.6764	198.6764	5.0700e-003	4.7900e-003	200.2292
Total	**0.0788**	**0.2982**	**0.7174**	**3.1800e-003**	**0.2707**	**2.7400e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**328.9923**	**328.9923**	**9.1800e-003**	**0.0237**	**336.2704**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	65.9983					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**66.1791**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.9000e-003	0.2555	0.0905	1.2100e-003	0.0406	1.5700e-003	0.0422	0.0117	1.5100e-003	0.0132		130.3158	130.3158	4.1100e-003	0.0189	136.0412
Worker	0.0719	0.0427	0.6269	1.9700e-003	0.2300	1.1700e-003	0.2312	0.0610	1.0800e-003	0.0621		198.6764	198.6764	5.0700e-003	4.7900e-003	200.2292
Total	**0.0788**	**0.2982**	**0.7174**	**3.1800e-003**	**0.2707**	**2.7400e-003**	**0.2734**	**0.0727**	**2.5900e-003**	**0.0753**		**328.9923**	**328.9923**	**9.1800e-003**	**0.0237**	**336.2704**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.3252	2.3148	20.7867	0.0464	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,722.8255	4,722.8255	0.3131	0.1978	4,789.6036
Unmitigated	2.3252	2.3148	20.7867	0.0464	38.3084	0.0346	38.3430	4.6468	0.0323	4.6791		4,722.8255	4,722.8255	0.3131	0.1978	4,789.6036

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Single Family Housing	830.00	839.13	751.98	2,341,802	2,341,802
Total	830.00	839.13	751.98	2,341,802	2,341,802

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	7.30	7.50	41.60	18.80	39.60	86	11	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Other Non-Asphalt Surfaces	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Single Family Housing	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
NaturalGas Unmitigated	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6432.37	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Total		**0.0694**	**0.5928**	**0.2523**	**3.7800e-003**		**0.0479**	**0.0479**		**0.0479**	**0.0479**		**756.7497**	**756.7497**	**0.0145**	**0.0139**	**761.2467**

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	6.43237	0.0694	0.5928	0.2523	3.7800e-003		0.0479	0.0479		0.0479	0.0479		756.7497	756.7497	0.0145	0.0139	761.2467
Total		**0.0694**	**0.5928**	**0.2523**	**3.7800e-003**		**0.0479**	**0.0479**		**0.0479**	**0.0479**		**756.7497**	**756.7497**	**0.0145**	**0.0139**	**761.2467**

6.0 Area Detail

6.1 Mitigation Measures Area

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264
Unmitigated	5.9231	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380	0.0000	12.3311	12.3311	0.0118	0.0000	12.6264

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.6422					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.0754					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2055	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380		12.3311	12.3311	0.0118		12.6264
Total	**5.9231**	**0.0788**	**6.8417**	**3.6000e-004**		**0.0380**	**0.0380**		**0.0380**	**0.0380**	**0.0000**	**12.3311**	**12.3311**	**0.0118**	**0.0000**	**12.6264**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.6422					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.0754					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2055	0.0788	6.8417	3.6000e-004		0.0380	0.0380		0.0380	0.0380		12.3311	12.3311	0.0118		12.6264
Total	**5.9231**	**0.0788**	**6.8417**	**3.6000e-004**		**0.0380**	**0.0380**		**0.0380**	**0.0380**	**0.0000**	**12.3311**	**12.3311**	**0.0118**	**0.0000**	**12.6264**

7.0 Water Detail

7.1 Mitigation Measures Water

Guajome Lake Road Residential - San Diego County APCD Air District, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Guajome Lake Road Residential - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Guajome Lake Road Residential

San Diego County APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	5.00	Acre	5.00	217,800.00	0
City Park	0.79	Acre	0.79	34,391.00	0
Single Family Housing	83.00	Dwelling Unit	10.99	186,750.00	237

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	10			**Operational Year**	2025
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	539.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CalEEMod Defaults.

Land Use - See Project Description.

Construction Phase - CalEEMod defaults.

Trips and VMT - Trips Modified to round up odd one way trips.

Grading - 67,000 CY of export.

Architectural Coating - per MM-AQ-1

Vehicle Trips - Trip genreation rates updated to be consistient with traffic analysis.

Road Dust - 800 feet of travel on unpaved road on 50% of the trips entering or exiting the Project site.

Woodstoves - No Wood Fireplaces per MM-AQ-2

Energy Use - CalEEMod Defaults.

Guajome Lake Road Residential - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Construction Off-road Equipment Mitigation - Complinace with SDACPD Rules per PDF-AQ-1.

Mobile Land Use Mitigation - No Mitigation Applied.

Mobile Commute Mitigation - No Mitigation Applied.

Area Mitigation - No Mitigation Applied.

Energy Mitigation - No Mitigation Applied.

Water Mitigation - No Mitigation Applied.

Waste Mitigation - No Mitigation Applied.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Residential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Residential_Interior	250.00	50.00
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblFireplaces	NumberGas	45.65	0.00
tblFireplaces	NumberWood	29.05	0.00
tblGrading	MaterialExported	0.00	50,250.00
tblGrading	MaterialExported	0.00	16,750.00
tblLandUse	LandUseSquareFeet	34,412.40	34,391.00
tblLandUse	LandUseSquareFeet	149,400.00	186,750.00
tblLandUse	LotAcreage	26.95	10.99
tblRoadDust	MeanVehicleSpeed	40	25
tblRoadDust	RoadPercentPave	100	99.14
tblTripsAndVMT	HaulingTripNumber	6,281.00	6,282.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	15.00	16.00
tblTripsAndVMT	WorkerTripNumber	27.00	28.00
tblVehicleTrips	ST_TR	1.96	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblVehicleTrips	ST_TR	9.54	10.11
tblVehicleTrips	SU_TR	2.19	0.00
tblVehicleTrips	SU_TR	8.55	9.06
tblVehicleTrips	WD_TR	0.78	0.00
tblVehicleTrips	WD_TR	9.44	10.00
tblWoodstoves	NumberCatalytic	4.15	0.00
tblWoodstoves	NumberNoncatalytic	4.15	0.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1635	1.9885	1.5796	5.7800e-003	0.3807	0.0648	0.4455	0.1442	0.0604	0.2046	0.0000	543.0451	543.0451	0.0720	0.0480	559.1531
2024	0.8697	1.7806	2.2574	5.1500e-003	0.1537	0.0717	0.2254	0.0417	0.0674	0.1091	0.0000	462.2420	462.2420	0.0700	0.0178	469.2897
Maximum	**0.8697**	**1.9885**	**2.2574**	**5.7800e-003**	**0.3807**	**0.0717**	**0.4455**	**0.1442**	**0.0674**	**0.2046**	**0.0000**	**543.0451**	**543.0451**	**0.0720**	**0.0480**	**559.1531**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.1635	1.9885	1.5796	5.7800e-003	0.2482	0.0648	0.3129	0.0858	0.0604	0.1463	0.0000	543.0448	543.0448	0.0720	0.0480	559.1529
2024	0.8697	1.7806	2.2574	5.1500e-003	0.1537	0.0717	0.2254	0.0417	0.0674	0.1091	0.0000	462.2417	462.2417	0.0700	0.0178	469.2894
Maximum	**0.8697**	**1.9885**	**2.2574**	**5.7800e-003**	**0.2482**	**0.0717**	**0.3129**	**0.0858**	**0.0674**	**0.1463**	**0.0000**	**543.0448**	**543.0448**	**0.0720**	**0.0480**	**559.1529**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**24.81**	**0.00**	**19.76**	**31.38**	**0.00**	**18.59**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**6-5-2023**	**9-4-2023**	1.3498	1.3498
2	**9-5-2023**	**12-4-2023**	0.6133	0.6133
3	**12-5-2023**	**3-4-2024**	0.5893	0.5893
4	**3-5-2024**	**6-4-2024**	0.5816	0.5816
5	**6-5-2024**	**9-4-2024**	0.5802	0.5802
6	**9-5-2024**	**9-30-2024**	0.1640	0.1640
		Highest	1.3498	1.3498

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.0620	7.0900e-003	0.6158	3.0000e-005		3.4200e-003	3.4200e-003		3.4200e-003	3.4200e-003	0.0000	1.0068	1.0068	9.6000e-004	0.0000	1.0309
Energy	0.0127	0.1082	0.0460	6.9000e-004		8.7500e-003	8.7500e-003		8.7500e-003	8.7500e-003	0.0000	287.2040	287.2040	0.0123	3.5000e-003	288.5534
Mobile	0.3965	0.4411	3.7187	7.9300e-003	6.7935	6.1500e-003	6.7996	0.8214	5.7300e-003	0.8272	0.0000	733.2810	733.2810	0.0524	0.0333	744.5047
Waste						0.0000	0.0000		0.0000	0.0000	19.7388	0.0000	19.7388	1.1665	0.0000	48.9021
Water						0.0000	0.0000		0.0000	0.0000	1.7156	29.0853	30.8010	0.1780	4.3800e-003	36.5548
Total	**1.4712**	**0.5563**	**4.3805**	**8.6500e-003**	**6.7935**	**0.0183**	**6.8118**	**0.8214**	**0.0179**	**0.8394**	**21.4545**	**1,050.5771**	**1,072.0316**	**1.4102**	**0.0412**	**1,119.5460**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.0620	7.0900e-003	0.6158	3.0000e-005		3.4200e-003	3.4200e-003		3.4200e-003	3.4200e-003	0.0000	1.0068	1.0068	9.6000e-004	0.0000	1.0309
Energy	0.0127	0.1082	0.0460	6.9000e-004		8.7500e-003	8.7500e-003		8.7500e-003	8.7500e-003	0.0000	287.2040	287.2040	0.0123	3.5000e-003	288.5534
Mobile	0.3965	0.4411	3.7187	7.9300e-003	6.7935	6.1500e-003	6.7996	0.8214	5.7300e-003	0.8272	0.0000	733.2810	733.2810	0.0524	0.0333	744.5047
Waste						0.0000	0.0000		0.0000	0.0000	19.7388	0.0000	19.7388	1.1665	0.0000	48.9021
Water						0.0000	0.0000		0.0000	0.0000	1.7156	29.0853	30.8010	0.1780	4.3800e-003	36.5548
Total	**1.4712**	**0.5563**	**4.3805**	**8.6500e-003**	**6.7935**	**0.0183**	**6.8118**	**0.8214**	**0.0179**	**0.8394**	**21.4545**	**1,050.5771**	**1,072.0316**	**1.4102**	**0.0412**	**1,119.5460**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	7/1/2023	7/14/2023	5	10	
2	Grading	Grading	7/15/2023	8/25/2023	5	30	
3	Building Construction	Building Construction	8/26/2023	10/18/2024	5	300	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4	Paving	Paving	10/19/2024	11/15/2024	5	20	
5	Architectural Coating	Architectural Coating	11/16/2024	12/13/2024	5	20	

Acres of Grading (Site Preparation Phase): 15

Acres of Grading (Grading Phase): 90

Acres of Paving: 5

Residential Indoor: 378,169; Residential Outdoor: 126,056; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 13,068 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	6.00	2,094.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	6.00	6,282.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	136.00	50.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	16.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	28.00	6.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0995	0.0000	0.0995	0.0507	0.0000	0.0507	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0133	0.1376	0.0912	1.9000e-004		6.3300e-003	6.3300e-003		5.8200e-003	5.8200e-003	0.0000	16.7254	16.7254	5.4100e-003	0.0000	16.8606
Total	**0.0133**	**0.1376**	**0.0912**	**1.9000e-004**	**0.0995**	**6.3300e-003**	**0.1058**	**0.0507**	**5.8200e-003**	**0.0565**	**0.0000**	**16.7254**	**16.7254**	**5.4100e-003**	**0.0000**	**16.8606**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.3100e-003	0.1421	0.0378	6.3000e-004	0.0179	1.1600e-003	0.0191	4.9300e-003	1.1100e-003	6.0400e-003	0.0000	62.8352	62.8352	3.1600e-003	9.9900e-003	65.8921
Vendor	4.0000e-005	1.3300e-003	4.7000e-004	1.0000e-005	2.0000e-004	1.0000e-005	2.1000e-004	6.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.6020	0.6020	2.0000e-005	9.0000e-005	0.6284
Worker	2.4000e-004	1.7000e-004	2.0500e-003	1.0000e-005	7.2000e-004	0.0000	7.3000e-004	1.9000e-004	0.0000	2.0000e-004	0.0000	0.5711	0.5711	2.0000e-005	2.0000e-005	0.5763
Total	**2.5900e-003**	**0.1436**	**0.0403**	**6.5000e-004**	**0.0189**	**1.1700e-003**	**0.0200**	**5.1800e-003**	**1.1200e-003**	**6.3100e-003**	**0.0000**	**64.0083**	**64.0083**	**3.2000e-003**	**0.0101**	**67.0968**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0448	0.0000	0.0448	0.0228	0.0000	0.0228	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0133	0.1376	0.0912	1.9000e-004		6.3300e-003	6.3300e-003		5.8200e-003	5.8200e-003	0.0000	16.7253	16.7253	5.4100e-003	0.0000	16.8606
Total	**0.0133**	**0.1376**	**0.0912**	**1.9000e-004**	**0.0448**	**6.3300e-003**	**0.0511**	**0.0228**	**5.8200e-003**	**0.0286**	**0.0000**	**16.7253**	**16.7253**	**5.4100e-003**	**0.0000**	**16.8606**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.3100e-003	0.1421	0.0378	6.3000e-004	0.0179	1.1600e-003	0.0191	4.9300e-003	1.1100e-003	6.0400e-003	0.0000	62.8352	62.8352	3.1600e-003	9.9900e-003	65.8921
Vendor	4.0000e-005	1.3300e-003	4.7000e-004	1.0000e-005	2.0000e-004	1.0000e-005	2.1000e-004	6.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.6020	0.6020	2.0000e-005	9.0000e-005	0.6284
Worker	2.4000e-004	1.7000e-004	2.0500e-003	1.0000e-005	7.2000e-004	0.0000	7.3000e-004	1.9000e-004	0.0000	2.0000e-004	0.0000	0.5711	0.5711	2.0000e-005	2.0000e-005	0.5763
Total	**2.5900e-003**	**0.1436**	**0.0403**	**6.5000e-004**	**0.0189**	**1.1700e-003**	**0.0200**	**5.1800e-003**	**1.1200e-003**	**6.3100e-003**	**0.0000**	**64.0083**	**64.0083**	**3.2000e-003**	**0.0101**	**67.0968**

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1416	0.0000	0.1416	0.0553	0.0000	0.0553	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0498	0.5177	0.4208	9.3000e-004		0.0214	0.0214		0.0197	0.0197	0.0000	81.8028	81.8028	0.0265	0.0000	82.4642
Total	**0.0498**	**0.5177**	**0.4208**	**9.3000e-004**	**0.1416**	**0.0214**	**0.1630**	**0.0553**	**0.0197**	**0.0750**	**0.0000**	**81.8028**	**81.8028**	**0.0265**	**0.0000**	**82.4642**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.9300e-003	0.4263	0.1134	1.8800e-003	0.0538	3.4900e-003	0.0573	0.0148	3.3400e-003	0.0181	0.0000	188.5056	188.5056	9.4900e-003	0.0300	197.6764
Vendor	1.1000e-004	4.0000e-003	1.4100e-003	2.0000e-005	6.0000e-004	2.0000e-005	6.2000e-004	1.7000e-004	2.0000e-005	2.0000e-004	0.0000	1.8059	1.8059	5.0000e-005	2.6000e-004	1.8852
Worker	8.1000e-004	5.6000e-004	6.8400e-003	2.0000e-005	2.4100e-003	1.0000e-005	2.4200e-003	6.4000e-004	1.0000e-005	6.5000e-004	0.0000	1.9037	1.9037	6.0000e-005	5.0000e-005	1.9209
Total	**7.8500e-003**	**0.4309**	**0.1217**	**1.9200e-003**	**0.0568**	**3.5200e-003**	**0.0603**	**0.0156**	**3.3700e-003**	**0.0190**	**0.0000**	**192.2152**	**192.2152**	**9.6000e-003**	**0.0303**	**201.4825**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0637	0.0000	0.0637	0.0249	0.0000	0.0249	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0498	0.5177	0.4208	9.3000e-004		0.0214	0.0214		0.0197	0.0197	0.0000	81.8027	81.8027	0.0265	0.0000	82.4641
Total	**0.0498**	**0.5177**	**0.4208**	**9.3000e-004**	**0.0637**	**0.0214**	**0.0851**	**0.0249**	**0.0197**	**0.0446**	**0.0000**	**81.8027**	**81.8027**	**0.0265**	**0.0000**	**82.4641**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.9300e-003	0.4263	0.1134	1.8800e-003	0.0538	3.4900e-003	0.0573	0.0148	3.3400e-003	0.0181	0.0000	188.5056	188.5056	9.4900e-003	0.0300	197.6764
Vendor	1.1000e-004	4.0000e-003	1.4100e-003	2.0000e-005	6.0000e-004	2.0000e-005	6.2000e-004	1.7000e-004	2.0000e-005	2.0000e-004	0.0000	1.8059	1.8059	5.0000e-005	2.6000e-004	1.8852
Worker	8.1000e-004	5.6000e-004	6.8400e-003	2.0000e-005	2.4100e-003	1.0000e-005	2.4200e-003	6.4000e-004	1.0000e-005	6.5000e-004	0.0000	1.9037	1.9037	6.0000e-005	5.0000e-005	1.9209
Total	**7.8500e-003**	**0.4309**	**0.1217**	**1.9200e-003**	**0.0568**	**3.5200e-003**	**0.0603**	**0.0156**	**3.3700e-003**	**0.0190**	**0.0000**	**192.2152**	**192.2152**	**9.6000e-003**	**0.0303**	**201.4825**

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0708	0.6473	0.7310	1.2100e-003		0.0315	0.0315		0.0296	0.0296	0.0000	104.3121	104.3121	0.0248	0.0000	104.9325
Total	**0.0708**	**0.6473**	**0.7310**	**1.2100e-003**		**0.0315**	**0.0315**		**0.0296**	**0.0296**	**0.0000**	**104.3121**	**104.3121**	**0.0248**	**0.0000**	**104.9325**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.6400e-003	0.0999	0.0352	4.6000e-004	0.0149	5.9000e-004	0.0155	4.3100e-003	5.6000e-004	4.8800e-003	0.0000	45.1463	45.1463	1.3600e-003	6.5400e-003	47.1299
Worker	0.0166	0.0115	0.1395	4.2000e-004	0.0491	2.7000e-004	0.0494	0.0130	2.5000e-004	0.0133	0.0000	38.8350	38.8350	1.1500e-003	1.0800e-003	39.1867
Total	**0.0192**	**0.1113**	**0.1747**	**8.8000e-004**	**0.0640**	**8.6000e-004**	**0.0649**	**0.0174**	**8.1000e-004**	**0.0182**	**0.0000**	**83.9813**	**83.9813**	**2.5100e-003**	**7.6200e-003**	**86.3165**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0708	0.6473	0.7310	1.2100e-003		0.0315	0.0315		0.0296	0.0296	0.0000	104.3120	104.3120	0.0248	0.0000	104.9324
Total	**0.0708**	**0.6473**	**0.7310**	**1.2100e-003**		**0.0315**	**0.0315**		**0.0296**	**0.0296**	**0.0000**	**104.3120**	**104.3120**	**0.0248**	**0.0000**	**104.9324**

Guajome Lake Road Residential - San Diego County APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.6400e-003	0.0999	0.0352	4.6000e-004	0.0149	5.9000e-004	0.0155	4.3100e-003	5.6000e-004	4.8800e-003	0.0000	45.1463	45.1463	1.3600e-003	6.5400e-003	47.1299
Worker	0.0166	0.0115	0.1395	4.2000e-004	0.0491	2.7000e-004	0.0494	0.0130	2.5000e-004	0.0133	0.0000	38.8350	38.8350	1.1500e-003	1.0800e-003	39.1867
Total	**0.0192**	**0.1113**	**0.1747**	**8.8000e-004**	**0.0640**	**8.6000e-004**	**0.0649**	**0.0174**	**8.1000e-004**	**0.0182**	**0.0000**	**83.9813**	**83.9813**	**2.5100e-003**	**7.6200e-003**	**86.3165**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1545	1.4116	1.6975	2.8300e-003		0.0644	0.0644		0.0606	0.0606	0.0000	243.4416	243.4416	0.0576	0.0000	244.8807
Total	**0.1545**	**1.4116**	**1.6975**	**2.8300e-003**		**0.0644**	**0.0644**		**0.0606**	**0.0606**	**0.0000**	**243.4416**	**243.4416**	**0.0576**	**0.0000**	**244.8807**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.9300e-003	0.2315	0.0803	1.0600e-003	0.0349	1.3800e-003	0.0362	0.0101	1.3200e-003	0.0114	0.0000	103.5066	103.5066	3.2600e-003	0.0150	108.0569
Worker	0.0363	0.0240	0.3040	9.6000e-004	0.1145	6.0000e-004	0.1151	0.0304	5.5000e-004	0.0310	0.0000	87.6476	87.6476	2.4500e-003	2.3600e-003	88.4127
Total	**0.0422**	**0.2555**	**0.3843**	**2.0200e-003**	**0.1494**	**1.9800e-003**	**0.1514**	**0.0405**	**1.8700e-003**	**0.0424**	**0.0000**	**191.1542**	**191.1542**	**5.7100e-003**	**0.0174**	**196.4696**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1545	1.4116	1.6975	2.8300e-003		0.0644	0.0644		0.0606	0.0606	0.0000	243.4413	243.4413	0.0576	0.0000	244.8804
Total	**0.1545**	**1.4116**	**1.6975**	**2.8300e-003**		**0.0644**	**0.0644**		**0.0606**	**0.0606**	**0.0000**	**243.4413**	**243.4413**	**0.0576**	**0.0000**	**244.8804**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.9300e-003	0.2315	0.0803	1.0600e-003	0.0349	1.3800e-003	0.0362	0.0101	1.3200e-003	0.0114	0.0000	103.5066	103.5066	3.2600e-003	0.0150	108.0569
Worker	0.0363	0.0240	0.3040	9.6000e-004	0.1145	6.0000e-004	0.1151	0.0304	5.5000e-004	0.0310	0.0000	87.6476	87.6476	2.4500e-003	2.3600e-003	88.4127
Total	**0.0422**	**0.2555**	**0.3843**	**2.0200e-003**	**0.1494**	**1.9800e-003**	**0.1514**	**0.0405**	**1.8700e-003**	**0.0424**	**0.0000**	**191.1542**	**191.1542**	**5.7100e-003**	**0.0174**	**196.4696**

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.8800e-003	0.0953	0.1463	2.3000e-004		4.6900e-003	4.6900e-003		4.3100e-003	4.3100e-003	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1885
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.8800e-003**	**0.0953**	**0.1463**	**2.3000e-004**		**4.6900e-003**	**4.6900e-003**		**4.3100e-003**	**4.3100e-003**	**0.0000**	**20.0265**	**20.0265**	**6.4800e-003**	**0.0000**	**20.1885**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	4.1000e-004	2.7000e-004	3.4100e-003	1.0000e-005	1.2800e-003	1.0000e-005	1.2900e-003	3.4000e-004	1.0000e-005	3.5000e-004	0.0000	0.9821	0.9821	3.0000e-005	3.0000e-005	0.9906
Total	**4.8000e-004**	**2.9200e-003**	**4.3300e-003**	**2.0000e-005**	**1.6800e-003**	**3.0000e-005**	**1.7000e-003**	**4.6000e-004**	**3.0000e-005**	**4.8000e-004**	**0.0000**	**2.1650**	**2.1650**	**7.0000e-005**	**2.0000e-004**	**2.2256**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.8800e-003	0.0953	0.1463	2.3000e-004		4.6900e-003	4.6900e-003		4.3100e-003	4.3100e-003	0.0000	20.0265	20.0265	6.4800e-003	0.0000	20.1884
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.8800e-003**	**0.0953**	**0.1463**	**2.3000e-004**		**4.6900e-003**	**4.6900e-003**		**4.3100e-003**	**4.3100e-003**	**0.0000**	**20.0265**	**20.0265**	**6.4800e-003**	**0.0000**	**20.1884**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	4.1000e-004	2.7000e-004	3.4100e-003	1.0000e-005	1.2800e-003	1.0000e-005	1.2900e-003	3.4000e-004	1.0000e-005	3.5000e-004	0.0000	0.9821	0.9821	3.0000e-005	3.0000e-005	0.9906
Total	**4.8000e-004**	**2.9200e-003**	**4.3300e-003**	**2.0000e-005**	**1.6800e-003**	**3.0000e-005**	**1.7000e-003**	**4.6000e-004**	**3.0000e-005**	**4.8000e-004**	**0.0000**	**2.1650**	**2.1650**	**7.0000e-005**	**2.0000e-004**	**2.2256**

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.6600					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.8100e-003	0.0122	0.0181	3.0000e-005		6.1000e-004	6.1000e-004		6.1000e-004	6.1000e-004	0.0000	2.5533	2.5533	1.4000e-004	0.0000	2.5569
Total	**0.6618**	**0.0122**	**0.0181**	**3.0000e-005**		**6.1000e-004**	**6.1000e-004**		**6.1000e-004**	**6.1000e-004**	**0.0000**	**2.5533**	**2.5533**	**1.4000e-004**	**0.0000**	**2.5569**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	7.1000e-004	4.7000e-004	5.9600e-003	2.0000e-005	2.2500e-003	1.0000e-005	2.2600e-003	6.0000e-004	1.0000e-005	6.1000e-004	0.0000	1.7186	1.7186	5.0000e-005	5.0000e-005	1.7336
Total	**7.8000e-004**	**3.1200e-003**	**6.8800e-003**	**3.0000e-005**	**2.6500e-003**	**3.0000e-005**	**2.6700e-003**	**7.2000e-004**	**3.0000e-005**	**7.4000e-004**	**0.0000**	**2.9015**	**2.9015**	**9.0000e-005**	**2.2000e-004**	**2.9685**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.6600					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.8100e-003	0.0122	0.0181	3.0000e-005		6.1000e-004	6.1000e-004		6.1000e-004	6.1000e-004	0.0000	2.5533	2.5533	1.4000e-004	0.0000	2.5568
Total	**0.6618**	**0.0122**	**0.0181**	**3.0000e-005**		**6.1000e-004**	**6.1000e-004**		**6.1000e-004**	**6.1000e-004**	**0.0000**	**2.5533**	**2.5533**	**1.4000e-004**	**0.0000**	**2.5568**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.0000e-005	2.6500e-003	9.2000e-004	1.0000e-005	4.0000e-004	2.0000e-005	4.1000e-004	1.2000e-004	2.0000e-005	1.3000e-004	0.0000	1.1829	1.1829	4.0000e-005	1.7000e-004	1.2349
Worker	7.1000e-004	4.7000e-004	5.9600e-003	2.0000e-005	2.2500e-003	1.0000e-005	2.2600e-003	6.0000e-004	1.0000e-005	6.1000e-004	0.0000	1.7186	1.7186	5.0000e-005	5.0000e-005	1.7336
Total	**7.8000e-004**	**3.1200e-003**	**6.8800e-003**	**3.0000e-005**	**2.6500e-003**	**3.0000e-005**	**2.6700e-003**	**7.2000e-004**	**3.0000e-005**	**7.4000e-004**	**0.0000**	**2.9015**	**2.9015**	**9.0000e-005**	**2.2000e-004**	**2.9685**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.3965	0.4411	3.7187	7.9300e-003	6.7935	6.1500e-003	6.7996	0.8214	5.7300e-003	0.8272	0.0000	733.2810	733.2810	0.0524	0.0333	744.5047
Unmitigated	0.3965	0.4411	3.7187	7.9300e-003	6.7935	6.1500e-003	6.7996	0.8214	5.7300e-003	0.8272	0.0000	733.2810	733.2810	0.0524	0.0333	744.5047

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Single Family Housing	830.00	839.13	751.98	2,341,802	2,341,802
Total	830.00	839.13	751.98	2,341,802	2,341,802

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	7.30	7.50	41.60	18.80	39.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751
Other Non-Asphalt Surfaces	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Single Family Housing	0.561854	0.062428	0.177046	0.117565	0.023832	0.006317	0.008949	0.006298	0.000705	0.000577	0.028723	0.000955	0.004751

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	161.9156	161.9156	9.9000e-003	1.2000e-003	162.5204
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	161.9156	161.9156	9.9000e-003	1.2000e-003	162.5204
NaturalGas Mitigated	0.0127	0.1082	0.0460	6.9000e-004		8.7500e-003	8.7500e-003		8.7500e-003	8.7500e-003	0.0000	125.2884	125.2884	2.4000e-003	2.3000e-003	126.0329
NaturalGas Unmitigated	0.0127	0.1082	0.0460	6.9000e-004		8.7500e-003	8.7500e-003		8.7500e-003	8.7500e-003	0.0000	125.2884	125.2884	2.4000e-003	2.3000e-003	126.0329

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5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	2.34782e+006	0.0127	0.1082	0.0460	6.9000e-004		8.7500e-003	8.7500e-003		8.7500e-003	8.7500e-003	0.0000	125.2884	125.2884	2.4000e-003	2.3000e-003	126.0329
Total		**0.0127**	**0.1082**	**0.0460**	**6.9000e-004**		**8.7500e-003**	**8.7500e-003**		**8.7500e-003**	**8.7500e-003**	**0.0000**	**125.2884**	**125.2884**	**2.4000e-003**	**2.3000e-003**	**126.0329**

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5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	2.34782e+006	0.0127	0.1082	0.0460	6.9000e-004		8.7500e-003	8.7500e-003		8.7500e-003	8.7500e-003	0.0000	125.2884	125.2884	2.4000e-003	2.3000e-003	126.0329
Total		**0.0127**	**0.1082**	**0.0460**	**6.9000e-004**		**8.7500e-003**	**8.7500e-003**		**8.7500e-003**	**8.7500e-003**	**0.0000**	**125.2884**	**125.2884**	**2.4000e-003**	**2.3000e-003**	**126.0329**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	661067	161.9156	9.9000e-003	1.2000e-003	162.5204
Total		**161.9156**	**9.9000e-003**	**1.2000e-003**	**162.5204**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	661067	161.9156	9.9000e-003	1.2000e-003	162.5204
Total		**161.9156**	**9.9000e-003**	**1.2000e-003**	**162.5204**

6.0 Area Detail

6.1 Mitigation Measures Area

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.0620	7.0900e-003	0.6158	3.0000e-005		3.4200e-003	3.4200e-003		3.4200e-003	3.4200e-003	0.0000	1.0068	1.0068	9.6000e-004	0.0000	1.0309
Unmitigated	1.0620	7.0900e-003	0.6158	3.0000e-005		3.4200e-003	3.4200e-003		3.4200e-003	3.4200e-003	0.0000	1.0068	1.0068	9.6000e-004	0.0000	1.0309

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2997					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.7438					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0185	7.0900e-003	0.6158	3.0000e-005		3.4200e-003	3.4200e-003		3.4200e-003	3.4200e-003	0.0000	1.0068	1.0068	9.6000e-004	0.0000	1.0309
Total	**1.0620**	**7.0900e-003**	**0.6158**	**3.0000e-005**		**3.4200e-003**	**3.4200e-003**		**3.4200e-003**	**3.4200e-003**	**0.0000**	**1.0068**	**1.0068**	**9.6000e-004**	**0.0000**	**1.0309**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2997					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.7438					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0185	7.0900e-003	0.6158	3.0000e-005		3.4200e-003	3.4200e-003		3.4200e-003	3.4200e-003	0.0000	1.0068	1.0068	9.6000e-004	0.0000	1.0309
Total	**1.0620**	**7.0900e-003**	**0.6158**	**3.0000e-005**		**3.4200e-003**	**3.4200e-003**		**3.4200e-003**	**3.4200e-003**	**0.0000**	**1.0068**	**1.0068**	**9.6000e-004**	**0.0000**	**1.0309**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	30.8010	0.1780	4.3800e-003	36.5548
Unmitigated	30.8010	0.1780	4.3800e-003	36.5548

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.94127	2.5614	1.6000e-004	2.0000e-005	2.5709
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	5.40778 / 3.40926	28.2396	0.1778	4.3600e-003	33.9839
Total		**30.8010**	**0.1780**	**4.3800e-003**	**36.5548**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.94127	2.5614	1.6000e-004	2.0000e-005	2.5709
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	5.40778 / 3.40926	28.2396	0.1778	4.3600e-003	33.9839
Total		**30.8010**	**0.1780**	**4.3800e-003**	**36.5548**

8.0 Waste Detail

8.1 Mitigation Measures Waste

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	19.7388	1.1665	0.0000	48.9021
Unmitigated	19.7388	1.1665	0.0000	48.9021

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.07	0.0142	8.4000e-004	0.0000	0.0352
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	97.17	19.7246	1.1657	0.0000	48.8669
Total		**19.7388**	**1.1665**	**0.0000**	**48.9021**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.07	0.0142	8.4000e-004	0.0000	0.0352
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	97.17	19.7246	1.1657	0.0000	48.8669
Total		**19.7388**	**1.1665**	**0.0000**	**48.9021**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

11.0 Vegetation

Attachment C

Revised Appendix B (Construction Noise Modeling Inputs and Outputs) of Appendix J (Noise Technical Report)

Construction Activity	Equipment	Total Equipment Qty	AUF % (from FHWA RCNM)	Reference Lmax @ 50 ft. from FHWA RCNM	Client Equipment Description, Data Source and/or Notes	Source to NSR Distance (ft.)	*Temporary Barrier Insertion Loss (dB)*	*Additional Noise Reduction*	Distance-Adjusted Lmax	Allowable Operation Time (hours)	Allowable Operation Time (minutes)	Predicted 8-hour Leq	Source Elevation (ft)	Receiver Elevation (ft)	Barrier Height (ft)	Source to Barr. ("A") Horiz. (ft)	Rcvr. to Barr. ("B") Horiz. (ft)	Source to Rcvr. ("C") Horiz. (ft)	"A" (ft)	"B" (ft)	"C" (ft)	Path Length Diff. "P" (ft)	Abarr (dB)	ILbarr (dB)	Notes
Site Prep	Dozer	1	40	82		40	0.4		83.5	1.5	90	72	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	Backhoe	1	40	78		40	0.4		79.5	1.5	90	68	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
									Total for Site Prep Phase:			**73.7**													
Grading	excavator	1	40	81		40	0.4		82.5	1.5	90	71	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	grader	1	40	85		40	0.4		86.5	1.5	90	75	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	dozer	1	40	82		40	0.4		83.5	1.5	90	72	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	scraper	1	40	84		40	0.4		85.5	1.5	90	74	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	backhoe	1	40	78		40	0.4		79.5	1.5	90	68	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
									Total for Grading Phase:			**79.9**													
Paving	paver	1	50	77		40	0.4		78.5	1.5	90	68	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	roller	1	20	80		40	0.4		81.5	1.5	90	67	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
									Total for Paving Phase:			**70.8**													
Building Construction	crane	1	16	81		40	0.4		82.5	1.5	90	67	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	Man lift	1	20	75		40	0.4		76.5	1.5	90	62	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	Generator	1	50	72		40	0.4		73.5	1.5	90	63	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	Backhoe	1	40	78		40	0.4		79.5	1.5	90	68	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
	welder / torch	1	40	73		40	0.4		74.5	1.5	90	63	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
									Total for Building Construction Phase:			**72.5**													
Architectural Coating	Compressor (Air)	1	40	78		40	0.4		79.5	1.5	90	68	5	5	0	35	5	40	35.4	7.1	40.0	0.00	0.1	0.4	
									Total for Architectural Coating Phase:			**68.3**													

Construction Activity	Equipment	Total Equipment Qty	AUF % (from FHWA RCNM)	Reference Lmax @ 50 ft. from FHWA RCNM	Client Equipment Description, Data Source and/or Notes	Source to NSR Distance (ft.)	*Temporary Barrier Insertion Loss (dB)*	*Additional Noise Reduction*	Distance-Adjusted Lmax	Allowable Operation Time (hours)	Allowable Operation Time (minutes)	Predicted 8-hour Leq	Source Elevation (ft)	Receiver Elevation (ft)	Barrier Height (ft)	Source to Barr. ("A") Horiz. (ft)	Rcvr. to Barr. ("B") Horiz. (ft)	Source to Rcvr. ("C") Horiz. (ft)	"A" (ft)	"B" (ft)	"C" (ft)	Path Length Diff. "P" (ft)	Abarr (dB)	ILbarr (dB)	Notes
Site Prep	Dozer	3	40	82		200	0.0		66.1	6	360	66	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	Backhoe	4	40	78		200	0.0		62.1	6	360	63	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
									Total for Site Prep Phase:			**67.4**													
Grading	excavator	2	40	81		200	0.0		65.1	6	360	63	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	grader	1	40	85		200	0.0		69.1	6	360	64	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	dozer	1	40	82		200	0.0		66.1	6	360	61	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	scraper	2	40	84		200	0.0		68.1	6	360	66	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	backhoe	2	40	78		200	0.0		62.1	6	360	60	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
									Total for Grading Phase:			**70.1**													
Paving	paver	2	50	77		200	0.0		61.1	8	480	61	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	roller	2	20	80		200	0.0		64.1	8	480	60	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
									Total for Paving Phase:			**63.6**													
Building Construction	crane	1	16	81		200	0.0		65.1	8	480	57	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	Man lift	3	20	75		200	0.0		59.1	8	480	57	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	Generator	1	50	72		200	0.0		56.1	8	480	53	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	Backhoe	3	40	78		200	0.0		62.1	8	480	63	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
	welder / torch	1	40	73		200	0.0		57.1	8	480	53	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
									Total for Building Construction Phase:			**65.2**													
Architectural Coating	Compressor (Air)	1	40	78		200	0.0		62.1	8	480	58	5	5	0	195	5	200	195.1	7.1	200.0	0.00	0.1	0.0	
									Total for Architectural Coating Phase:			**58.1**													

Equipment Description	Impact Device?	Acoustical Use Factor (%)	Lesser of or available Lmax	Spec. 721 Lmax	Measured L_{max} @50ft (dBA, slow)
All Other Equipment > 5 HP	No	50	85	85	-- N/A --
Auger Drill Rig	No	20	84	85	84
Backhoe	No	40	78	80	78
Phase 1					
Demolition	concrete saw	20	80	80	-- N/A --
Blasting	excavator	-- N/A --	94	94	-- N/A --
Boring Jack Power Unit	dozer	50	80	80	83
Chain Saw	No	20	84	85	84
Site Prep	dozer	20	87	93	87
Compactor (ground)	backhoe	20	80	80	83
Concrete Batch Plant	No	15	83	83	-- N/A --
Concrete Mixer Truck	No	40	79	85	79
Grading	excavator	20	81	82	81
Concrete Saw	grader	20	90	90	90
Crane	dozer	16	81	85	81
Dozer	scraper	40	82	85	82
Drill Rig Truck	backhoe	20	79	84	79
Drum Mixer	No	50	80	80	80
Paving	paver	40	76	84	76
Excavator	roller	40	81	85	81
Generator	No	50	72	72	81
Generator (<25KVA, VMS signs)	No	50	70	70	73
Phase 2					
Building Construction	crane	20	80	80	-- N/A --
Blasting	Man lift	-- N/A --	94	94	-- N/A --
Boring Jack Power Unit	Generator	50	80	80	83
Boring Jack Power Unit	Bakhoe	50	80	80	83
Chain Saw	No	20	84	85	84

Architectural Coating	Yes	20	87	93	87
Compactor (ground)	No	20	80	80	83
Compressor (air)	No	40	78	80	78
Concrete Batch Plant	No	15	83	83	-- N/A --
Phase 3					
Building Construction	No	20	80	80	-- N/A --
Blasting	Yes	-- N/A --	94	94	-- N/A --
Boring Jack Power Unit	No	50	80	80	83
Chain Saw	No	20	84	85	84
Architectural Coating	Yes	20	87	93	87
Compactor (ground)	No	20	80	80	83
Compressor (air)	No	40	78	80	78
Concrete Batch Plant	No	15	83	83	-- N/A --
Concrete Mixer Truck	No	40	79	85	79
Grader	No	40	85	85	-- N/A --
Grapple (on backhoe)	No	40	85	85	87
Horizontal Boring Hydr. Jack	No	25	80	80	82
Hydra Break Ram	Yes	10	90	90	-- N/A --
Impact Pile Driver	Yes	20	95	95	101
Jackhammer	Yes	20	85	85	89
Man Lift	No	20	75	85	75
Mounted Impact Hammer (hoe ram)	Yes	20	90	90	90
Pavement Scarafier	No	20	85	85	90
Paver	No	50	77	85	77
Pickup Truck	No	40	55	55	75
Pneumatic Tools	No	50	85	85	85
Pumps	No	50	77	77	81
Refrigerator Unit	No	100	73	82	73
Rivit Buster/chipping gun	Yes	20	79	85	79
Rock Drill	No	20	81	85	81
Roller	No	20	80	85	80
Sand Blasting (Single Nozzle)	No	20	85	85	96
Scraper	No	40	84	85	84

Shears (on backhoe)	No	40	85	85	96
Slurry Plant	No	100	78	78	78
Slurry Trenching Machine	No	50	80	82	80
Soil Mix Drill Rig	No	50	80	80	-- N/A --
Tractor	No	40	84	84	-- N/A --
Vacuum Excavator (Vac-truck)	No	40	85	85	85
Vacuum Street Sweeper	No	10	80	80	82
Ventilation Fan	No	100	79	85	79
Vibrating Hopper	No	50	85	85	87
Vibratory Concrete Mixer	No	20	80	80	80
Vibratory Pile Driver	No	20	95	95	101
Warning Horn	No	5	83	85	83
Welder / Torch	No	40	73	73	74

Attachment D

Revised Attachment D (Prohibited Plant List) of Appendix O (Fire Protection Plan Letter Report)

Attachment D

San Diego County Acceptable and Prohibited Plant List

ATTACHMENT D
Prohibited Plants List

Botanical Name	Common Name	Comment*
Trees		
Abies species	Fir	H
Acacia species (numerous)	Acacia	H
Agonis juniperina	Juniper Myrtle	H
Araucaria species (A. heterophylla, A. araucana, A. bidwillii)	Araucaria (Norfolk Island Pine, Monkey Puzzle Tree, Bunya Bunya)	H
Cedrus species (C. atlantica, C. deodara)	Cedar (Atlas, Deodar)	H
Chamaecyparis species	False Cypress	H
Cryptomeria japonica	Japanese Cryptomeria	H
Cupressocyparis leylandii	Leyland Cypress	H
Cupressus species (C. fobesii, C. glabra, C. sempervirens,)	Cypress (Tecate, Arizona, Italian, others)	H,Tecate=SDC
Eucalyptus species (numerous)	Eucalyptus	H
Juniperus species (numerous)	Juniper	H
Larix species (L. decidua, L. occidentalis, L. kaempferi)	Larch (European, Japanese, Western)	H
Palm species	Palms	H
Picea (numerous)	Spruce	H
Pinus species (P. brutia, P. canariensis, P. b. oldarica, P. halepensis, P. pinea, P. radiata, numerous others)	Pine (Calabrian, Canary Island, Mondell, Aleppo, Italian Stone, Monterey)	H
Platycladus orientalis	Oriental arborvitae	H
Podocarpus gracilior	Fern Pine	H
Pseudotsuga menziesii	Douglas Fir	H
Taxodium species (T. ascendens, T. distichum, T. mucronatum)	Cypress (Pond, Bald, Monarch, Montezuma)	H
Taxus species (T. baccata, T. brevifolia, T. cuspidata)	Yew (English, Western, Japanese)	H
Thuja species (T. occidentalis, T. plicata)	Arborvitae/Red Cedar	H
Tsuga species (T. heterophylla, T. mertensiana)	Hemlock (Western, Mountain)	H
Groundcovers & Shrubs		
Acacia species	Acacia	H
Adenostoma fasciculatum	Chamise	H,SDC
Adenostoma sparsifolium	Red Shanks	H,SDC
Artemisia species (A. abrotanium, A. absinthium, A. californica, A. caucasica, A. dracunculus, A. tridentata, A. pynocephala)	Sagebrush (Southernwood, Wormwood, California, Silver, True tarragon, Big, Sandhill)	H,SDC
Arundo donax	Giant Reed	
Bambusa species	Bamboo	H
Dodonaea viscosa	Hopseed Bush	H
Eriogonum fasciculatum	Common Buckwheat	H,SDC
Heteromeles arbutifolia	Toyon	M
Heterotheca grandiflora	Telegraph Plant	H,SDC
Juniperus species	Juniper	H
Lonicera japonica	Japanese Honeysuckle	H
Malosoma Laurina	Laurel Sumac	M
Miscanthus species	Eulalia Grass	H

Botanical Name	Common Name	Comment*
Muehlenbergia species	Deer Grass	H,SDC
Groundcovers & Shrubs (cont.)		
Pennisetum setaceum	Fountain Grass	H
Pickeringia montana	Chaparral Pea	H,SDC
Quercus dumosa	Scrub Oak	M
Rosmarinus species	Rosemary	H
Rhus integrifolia	Lemonade Berry	M
Salvia mellifera	Black Sage	H,SDC
Thuja species	Arborvitae	H
Urtica urens	Burning Nettle	H,SDC
Xylococcus bicolor	Mission Manzanita	M

*H = High Fuel Plants, M = Moderate Fuel Plants, SDC = San Diego County Native Species

Notes:

1. This list was prepared by Dudek for the Guajome Crest Project. Certain plants are considered to be undesirable in the landscape due to characteristic that make them highly flammable. These characteristics can be either physical or chemical. Physical properties would include large amounts of dead material retained within the plant, rough or peeling bark, and the production of copious amounts of litter. Chemical properties include the presence of volatile substances such as oils, resins, wax, and pitch. Plants with these characteristics should not be planted close to structures in fire hazard areas. These species are typically referred to as "Target Species" or "Moderate to High Fuel Plants", since their complete or partial removal from the landscape is a critical part of hazard reduction. High Fuel Plants are highly flammable and should not be planted within 50 feet of a structure. Moderate Fuel Plants are considered moderately flammable and should be avoided when only slow burning/low fuel species are permitted within a given fuel modification zone. Many of these species, if existing on the property and adequately maintained (e.g., pruning, thinning, irrigated, litter removal and weeding), could remain as long as the potential for spreading a fire has been reduced or eliminated.
2. For the purpose of using this list as a guide in selecting plant material, it is stipulated that all plant material will burn under various conditions.
3. The absence of a particular plant, shrub, groundcover, or tree, from this list does not necessarily mean it is fire resistive.
4. All vegetation used in Vegetation Management Zones and elsewhere in this development shall be subject to approval of the City's Fire Code Official and Landscape Architect.
5. Landscape architects may submit proposals for use of certain vegetation on a project specific basis. They shall also submit justifications as to the fire resistivity of the proposed vegetation.

REFERENCES:

City of Oceanside, California. 1995. Vegetation Management. Landscape Development Manual. Community Services Department, Engineering Division.

County of Los Angeles Fire Department. 1998. Fuel Modification Plan Guidelines. Appendix I: Undesirable Plant List.

County of San Diego. 2004. Department of Planning and Land Use, Building Division. Fire, Plants, Defensible Space and You (DPLU #199). June 2004.

Willis, E. 1997. San Diego County Fire Chief's Association. Wildland/Urban Interface Development Standards. August 1997.

Providing enough fire protection for rural areas of San Diego County has become difficult. This is due to the large number of residents who are moving to the rural areas of the County and the increasing amounts of brush, weeds and other vegetation that provide fuel for wildfires and cause them to burn hotter. While its important to protect the wild native vegetation in the County's rural areas it's also important to take steps for adequate fire protection for structures. Legally clearing vegetation protects the other wild native plants and at the same time eliminates the fire hazards.

During the October 2003 Firestorms, it was painfully evident that there was insufficient "Defensible Space" on many properties which led to destroyed homes and other structures. As a result, San Diego County has amended an ordinance to require residents to keep their property free of fire hazards that include certain vegetation, green waste and rubbish. Residents can comply with these ordinances by creating a "Defensible Space" and taking other preventative steps on their property.

WHAT IS DEFENSIBLE SPACE?

This is the area around a structure where combustible vegetation, that can cause fire, has been cleared, reduced or replaced. This space acts as a barrier between an advancing fire and a structure.

HOW DO I CLEAR LEGALLY?

Combustible vegetation can only be removed by mowing, cutting and grazing as long as the root structure is left intact. Any trees you remove shall have the stumps cut no higher than 8" above the ground. The only exception would be an orchard. Orchard trees may have their stumps completely removed.

CAN I CLEAR INTO AN OPEN SPACE EASEMENT?

Depending upon fuel loads and topography, the Local Fire District may require clearing within an open space easement. This clearing does not require a permit so long as you obtain a letter from the Local Fire District specifying the amount of additional clearing required and comply with any clearing provisions stated in the recorded open space easement document or recorded subdivision map. .

WHAT IS COMBUSTIBLE VEGETATION?

This is any material that in its natural state will readily ignite, burn and cause fire to move to any structure or other vegetation. This would include dry grass, brush, weeds, litter and waste. This would not include fire resistant landscaping some of which can be found in the "Suggested Plant List For Defensible Space" on page 4 of this handout.

HOW LARGE SHOULD THE DEFENSIBLE SPACE BE?

- You need to clear combustible vegetation in a 100' radius from any structure. Only the fire agency may authorize you to clear more. You are not required to

cross your property line in order to clear the 100'. The neighboring property owner may be required to clear the additional distance by the fire agency.

HOW DO I MAINTAIN THE DEFENSIBLE SPACE?

- You may plant fire-resistant, irrigated, landscaping in the first 50'of the 100' from your structure. These plants need to be maintained all year around.
- You need to keep natural vegetation in the remaining 50' of the 100' space. This would be the area furthest away from your structure. The plants need to be thinned and cut back to no more than 6" above the ground. You may need to do this several times a year since the plants grow back.
- Do not completely remove all vegetation which would leave the ground bare. Some vegetation is necessary to prevent erosion.
- Remove dead and dying vegetation.
- Trim trees that overhang or touch your structures.

WHAT TYPES OF FIRE-RESISTANT PLANTS SHOULD I CHOOSE FOR MY DEFENSIBLE SPACE?

You will find a list of suggested plants for Defensible Space on page 4 of this handout. Generally these plants:

- Grow close to the ground.
- Have a low sap or resin content
- Grow without accumulating dead branches, needles or leaves.
- Are easily maintained and pruned
- Are drought-tolerant

WHAT TYPES OF PLANTS SHOULD I NOT PLANT OR KEEP ON MY PROPERTY?

On page 16 of this handout you will find an extensive list of plants that you should avoid. These plants and trees burn easily since they have large amounts of oil, sap, rough bark and other material that is flammable.

WHAT OTHER THINGS SHOULD I DO TO PROTECT MY PROPERTY AGAINST FIRE?

- You should clear combustible vegetation on your property if it is within 30' of your property line.
- Vary the height of plants and adequately space them. Taller plants need to be spaced wider apart.
- Existing trees and large shrubs should be pruned by cutting off any branches up to 6' above the ground to prevent ground fires from spreading upwards into trees.
- For fire truck access, remove vegetation within 10' of each side of your driveway.
- Remove any tree limbs within 10' of your chimney
- Work with your neighbors to clear common areas between houses, and prune areas of heavy vegetation that are a fire threat to both properties.
- Avoid planting trees under or near electrical lines. They may grow into, or make contact with overhead lines under windy conditions, causing fire.

- If you have a heavily wooded area on your property, remove some of the trees to which will lower the fire hazard. You will improve growing conditions for your trees if you remove dead, weak, or diseased trees. This will leave you with a healthy mixture of both new and older trees.
- Any removed trees may be chipped and left on your property if they don't present a fire hazard. Contact your local fire agency to find out how to do this.
- Don't forget to legally despose of all your cut vegetation. You may contact your local landfill to inquire about green waste recycling. Open burning may not be allowed. Contact your fire agency for more information.
- Stack firewood and scrap wood piles at least 50' from any structure and clear away any combustible vegetation within 10' of the piles. Many homes have "survived" as a fire moved past it, only to burn later from a wood pile that caught fire after the firefighters had moved on to protect other homes.
- Check and clean your roofs and gutters on all structures several times during the spring, summer and fall to remove debris that can easily ignite from a spark.

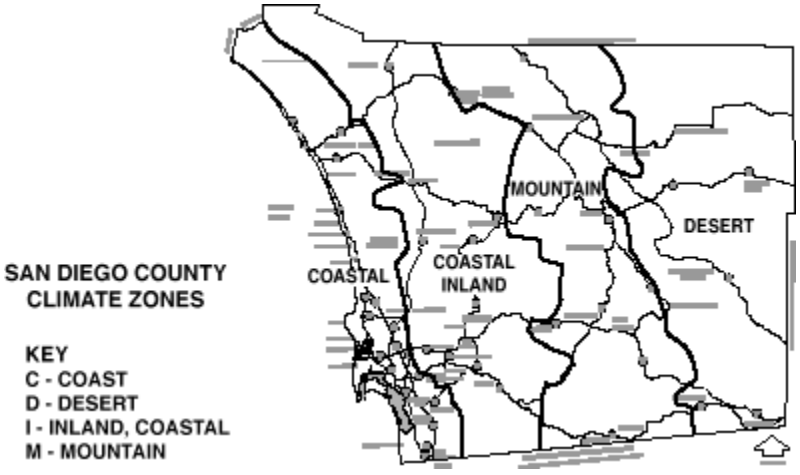
ACCEPTABLE PLANTS FOR A DEFENSIBLE SPACE IN FIRE PRONE AREAS

All plants on the following list are considered drought-tolerant in the climate zone indicated. Remember, however, that no plant is totally fire resistant. Drought-tolerant plants are trees, shrubs, groundcovers, and other vegetation that can grow and reproduce with only natural moisture such as rainfall. Occasional irrigation is necessary only in extreme drought situations.

Plants that are indicated by the **"R"** are the least drought-tolerant plants on the list. These plants grow best in riparian areas. Riparian areas can be described as areas where the water table is very near the surface of the ground. Although the ground may be dry, the plants growing there will be green and lush all year around.

When first planting drought-tolerant plants, you need to water deeply to encourage the roots to find natural moisture in the soil. This type of watering needs to continue for at least three years. More water should be provided in summer and less (if any) in the winter. After three years, you should be watering the plants less and depending more on the natural rainfall to provide moisture.

Plants on the list which are noted with ** are San Diego County native or naturalizing plant species. These are types of plants native to or brought into the San Diego County area. These plants are able to grow and reproduce in the local climate and the natural rainfall is enough moisture.



SUGGESTED PLANT LIST FOR A DEFENSIBLE SPACE

BOTANICAL NAME	COMMON NAME	Climate Zone
TREES		
Acer		
platanoides	Norway Maple	M
rubrum	Red Maple	M
saccharinum	Silver Maple	M
saccarum	Sugar Maple	M
macrophyllum	Big Leaf Maple	C/ (R)
Alnus rhombifolia	White Alder	C/I/M (R)
Arbutus		
unedo	Strawberry Tree	All zones
Archontophoenix		
cunninghamiana	King Palm	C
** Arctostaphylos spp.	Manzanita	C/I/D
Brahea		
armata	Blue Hesper Palm	C/D

edulis	Guadalupe Palm	C/D
Ceratonia siliqua	Carob	C/I/D
Cerdidium floridum	Blue Palo Verde	D
** Cercis occidentalis	Western Redbud	C/I/M
Cornus		
nuttallii	Mountain Dogwood	I/M
stolonifera	Redtwig Dogwood	I/M
Elaeagnus		
angustifolia	Russian Olive	I/M
Eriobotrya		
japonica	Loquat	C/I/D
Erythrina caffra	Kaffirboom Coral Tree	C
Gingko biloba "Fairmount"	Fairmount Maidenhair Tree	I/M
Gleditisia triacanthos	Honey Locust	I/D/M
Juglans		
californica	California Walnut	I
hindsii	California Black Walnut	C/I
Lagerstroemia indica	Crape Myrtle	I/D/M
Ligustrum lucidum	Glossy Privet	I
Liquidambar styraciflua	Sweet Gum	C/I/M
Liriodendron tulipifera	Tulip Tree	I
Lyonothamnus floribundus		
ssp. asplenifolius	Fernleaf Catalina Ironwood	C
Melaleuca spp.	Melaleuca	C/I/D

Myoporum spp.	Myoporum	C/I
Nerium oleander	Oleander	C/I/D
Parkinsonia aculeata	Mexican Palo Verde	D
Pistacia		
chinensis	Chinese Pistache	C/I/D
vera	Pistachio Nut	I
Pittosporum		
phillyraeoides	Willow Pittosporum	C/I/D
viridiflorum	Cape Pittosporum	C/I
Platanus		
acerifolia	London Plane Tree	All zones
** racemosa	California Sycamore	C/I/M
Populus		
alba	White Poplar	D/M
** fremontii	Western Cottonwood	I
trichocarpa	Black Cottonwood	I/M
Prunus		
xblireiana	Flowering Plum	M
caroliniana	Carolina Laurel Cherry	C
cersifera ‘Newport’	Newport Purple-Leaf Plum	M
** ilicifolia	Hollyleaf Cherry	C
** lyonii	Catalina Cherry	C
serrulata ‘Kwanzan’	Flowering Cherry	M
yedoensis ‘Akebono’	Akebono Flowering Cherry	M

Quercus		
** agrifolia	Coast Live Oak	C/I
** engelmannii	Engelmann Oak	I
suber	Cork Oak	C/I/D
Rhus		
** lancea	African Sumac	C/I/D
** Salix spp.	Willow	All zones (R)
Tristania conferta	Brisbane Box	C/I
Ulmus		
parvifolia	Chinese Elm	I/D
pumila	Siberian Elm	C/M
** Umbellularia californica	California Bay Laurel	C/I
SHRUBS		
Agave	Century Plant	D
americana	Desert Century Plant	D
deserti	Shaw's Century Plant	D
** shawii		
** Amorpha fruticosa	False Indigobush	I
Arbutus		
** menziesii	Madrone	C/I
** Arctostaphylos spp.	Manzanita	C/I/D
** Atriplex		
canescens	Hoary Saltbush	I
lentiformis	Quail Saltbush	D

** Baccharis		
glutinosa	Mule Fat	C/I
pilularis	Coyote Bush	C/I/D
Carissa grandiflora	Natal Plum	C/I
** Ceanothus spp.	California Lilac	C/I/M
Cistus spp.	Rockrose	C/I/D
** Cneoridium dumosum	Bushrue	C
** Comarostaphylis		
diversifolia	Summer Holly	C
Convolvulus cneorum	Bush Morning Glory	C/I/M
Dalea		
orcuttii	Orcutt's Delea	D
** spinosa	Smoke Tree	I/D
Elaeagnus		
pungens	Silverberry	C/I/M
** Encelia		
californica	Coast Sunflower	C/I
farinosa	White Brittlebush	D/I
Eriobotrya		
deflexa	Bronze Loquat	C/I
Eriophyllum		
** confertiflorum	Golden Yarrow	C/I
staechadifolium	Lizard Tail	C
Escallonia spp.	Escallonia	C/I

Feijoa sellowiana	Pineapple Guava	C/I/D
Fouqueria splendens	Ocotillo	D
** Fremontodendron		
californicum	Flannelbush	I/M
mexicanum	Southern Flannelbush	I
Galvezia		
juncea	Baja Bush-Snapdragon	C
speciosa	Island Bush-Snapdragon	C
Garrya		
elliptica	Coast Silktassel	C/I
** flavescens	Ashy Silktassel	I/M
** Heteromeles arbutifolia	Toyon	C/I/M
Lantana spp.	Lantana	C/I/D
Lotus scoparius	Deerweed	C/I
Mahonia spp.	Barberry	C/I/M
Malacothamnus		
clementinus	San Clemente Island Bush Mallow	C
** fasciculatus	Mesa Bushmallow	C/I
Melaleuca spp.	Melaleuca	C/I/D
** Mimulus spp.	Monkeyflower	C/I (R)
Nolina		
parryi	Parry’s Nolina	I
parryi ssp. wolfii	Wolf’s Bear Grass	D
Photinia spp.	Photinia	All zones

Pittosporum		
crassifolium		C/I
rhombifolium	Queensland Pittosporum	C/I
tobira ‘Wheeleri’	Wheeler’s Dwarf	C/I/D
undulatum	Victorian Box	C/I
viridiflorum	Cape Pittosporum	C/I
Plumbago auriculata	Cape Plumbago	C/I/D
Prunus		
caroliniana	Carolina Laurel Cherry	C
** ilicifolia	Hollyleaf Cherry	C
** yonii	Catalina Cherry	C
Puncia granatum	Pomegranate	C/I/D
Pyracantha spp.	Firethorn	All zones
Quercus		
** dumosa	Scrub Oak	C/I
Rhamus		
alaternus	Italian Blackthorn	C/I
** californica	Coffeeberry	C/I/M
Rhaphiolepis spp.	Rhaphiolepis	C/I/D
Rhus		
continus	Smoke Tree	M
** integrifolia	Lemonade Berry	C/I
laurina	Laurel Sumac	C/I
lentii	Pink-Flowering Sumac	C/D

** ovata	Sugarbush	I/M
** trilobata	Squawbush	I
Ribes		
viburnifolium	Evergreen Currant	C/I
** speciosum	Fuschia-Flowering Gooseberry	C/I/D
Romneya coulteri	Matilija Poppy	I
Rosa		
** californica	California Wild Rose	C/I
minutifolia	Baja California Wild Rose	C/I
** Salvia spp.	Sage	All zones
** Sambucus spp.	Elderberry	C/I/M
** Symphoricarpos mollis	Creeping Snowberry	C/I
Syringa vulgaris	Lilac	M
Tecomaria capensis	Cape Honeysuckle	C/I/D
Teucrium fruticans	Bush Germander	C/I
** Toxicodendron		
diversilobum	Poison Oak	I/M
Verbena		
lilacina	Lilac Verbena	C
Xylosma congestum	Shiny Xylosma	C/I
** Yucca		
schidigera	Mojave Yucca	D
whipplei	Foothill Yucca	I
GROUNDCOVERS		

** Achillea	Yarrow	All zones
Aptenia cordifolia	Aptenia	C
** Arctostaphylos spp.	Manzanita	C/I/D
** Baccharis		
pilularis	Coyote Bush	C/I/D
** Ceanothus spp.	California Lilac	C/I/M
Cerastium tomentosum	Snow-in-Summer	All zones
Coprosma kirkii	Creeping Coprosma	C/I/D
Cotoneaster spp.	Redberry	All zones
Drosanthemum hispidum	Rosea Ice Plant	C/I
Dudleya		
brittonii	Britton's Chalk Dudleya	C
** pulverulenta	Chalk Dudleya	C/I
virens	Island Live-Forever	C
** Eschscholzia californica	California Poppy	All zones
Euonymus fortunei		
'Carrierei'	Glossy Winter Creeper	M
'Coloratus'	Purple-Leaf Winter Creeper	M
** Ferocactus viridescens	Coast Barrel Cactus	C
Gaillardia grandiflora	Blanket Flower	All zones
Gazania spp.	Gazania	C/I
** Helianthemum spp.	Sunrose	All zones
Lantana spp.	Lantana	C/I/D

Lasthenia		
** californica	Common Goldfields	I
glabrata	Coastal Goldfields	C
** Lupinus spp.	Lupine	C/I/M
Myoporum spp.	Myoporum	C/I
Pyracantha spp.	Firethorn	All zones
Rosmarinus officinalis	Rosemary	C/I/D
Santolina		
chamaecyparissus	Lavender Cotton	All zones
virens	Santolina	All zones
Trifolium frageriferum	O'Connor's Legume	C/I
Verbena		
rigida	Verbena	All zones
** Viguiera laciniata	San Diego Sunflower	C/I
Vinca		
major	Periwinkle	C/I
minor	Dwarf Periwinkle	M
VINES		
Antigonon leptopus	San Miguel Coral Vine	C/I
Distictis buccinatoria	Blood-Red Trumpet Vine	C/I/D
** Keckiella cordifolia	Heart-Leaved Penstemon	C/I
Lonicera		
japonica 'Halliana'	Hall's Honeysuckle	All zones
** subspicata	Chaparral Honeysuckle	C/I

Solanum jasminoides	Potato Vine	C/I/D
PERENNIALS		
Coreopsis		
gigantea	Giant Coreopsis	C
grandiflora	Coreopsis	All zones
** maritima	Sea Dahlia	C
verticillata	Coreopsis	C/I
Heuchera maxima	Island Coral Bells	C/I
** Iris douglasiana	Douglas Iris	C/M
** Iva hayesiana	Poverty Weed	C/I
Kniphofia uvaria	Red-Hot Poker	C/I/M
Lavandula spp.	Lavender	All zones
Limonium californicum		
var. mexicanum	Coastal Statice	C
perezii	Sea Lavender	C/I
Oenothera spp.	Primrose	C/I/M
** Penstemon spp.	Penstemon	C/I/D
Satureja douglasii	Yerba Buena	C/I
Sisyrinchium		
bellum	Blue-Eyed Grass	C/I
californicum	Golden-Eyed Grass	C
Solanum		
xantii	Purple Nightshade	C/I

** Zauschneria		
californica	California Fuschia	C/I
cana	Hoary California Fuschia	C/I
‘Catalina’	Catalina Fuschia	C/I
ANNUALS		
** Lupinus spp.	Lupine	C/I/M

UNDESIRABLE PLANT LIST

The following species are highly flammable and should be avoided when planting within the first 50 feet adjacent to a structure. The plants listed below are more susceptible to burning, due to rough or peeling bark, production of large amounts of litter, vegetation that contains oils, resin, wax, or pitch, large amounts of dead material in the plant, or plantings with a high dead to live fuel ratio.

BOTANICAL NAME	COMMON NAME
Abies species	Fir Trees
Acacia species	Acacia (trees, shrubs, groundcovers)
*Adenostoma sparsifolium***	Red Shanks
*Adenostoma fasciculatum***	Chamise
Agonis juniperina	Juniper Myrtle
*Anthemis cotula****	Mayweed, Stinking Chamolile
Araucaria species	Monkey Puzzle, Norfolk Island Pine
*Arctostaphylos species***	Manzanita
*Artemesia californica***	California Sagebrush
Arundo donax	Giant Cane
Bambusa species	Bamboo
*Brassica species****	Mustard
Callistemon species	Bottlebrush
Calocedrus decurrens	Incense Cedar
*Cardaria draba****	Hoary Cress, Perennial Peppergrass
Ceanothus species	Ceanothus
Cedrus species	Cedar
Chamaecyparis species	False Cypress
Cinnamomum species	Camphor Tree
*Cirsium vulgare****	Wild Artichoke
*Conyza Canadensis****	Horseweed
Coprosma pumila	Prostrate Coprosma
Cortaderia selloana	Pampas Grass
Cotoneaster lacteus	Cotoneaster
Cryptomeria japonica	Japanese Cryptomeria
Cupressocyparis leylandii	Leylandii Cypress
Cupressus forbesii	Tecate Cypress
Cupressus glabra	Arizona Cypress
Cupressus macrocarpa	Monterey Cypress
Cupressus sempervirens	Italian Cypress
*Cynara cardunculus****	Artichoke Thistle
Cytisus species	Scotch Broom, French Broom,etc.
Dodonea viscosa	Hopseed Bush

Elaeagnus angustifolia	Russian Olive
Elaeagnus pungens	Silverberry
*Eriogonum fasciculatum***	Common Buckwheat
Eucalyptus species	Eucalyptus
*Gensita species****	Broom
*Heterotheca grandiflora***	Telegraph Plant
Jubaea chilensis	Chilean Wine Palm
Juniperus species	Junipers
*Lactuca serriola****	Prickly Lettuce
Larix species	Larch
Lonicera japonica	Japanese Honeysuckle
Miscanthus species	Eulalia Grass
*Muehlenbergia species***	Deer Grass
Nicotiana species	Tree Tobacco
Palmae species	Palms
Pennisetum setaceum	Fountain Grass
Picea species	Spruce Trees
*Pickeringia Montana***	Chaparral Pea
Pinus species	Pines
Podocarpus species	Fern Pine
Pseudotsuga menziesii	Douglas Fir
Ricinus communis	Castor Bean
Rosmarinus species	Rosemary
*Salsola australis****	Russian Thistle, Tumbleweed
*Salvia species***	Sage
Schinus molle	California Pepper
Schinus terebinthifolius	Brazilian Pepper
*Silybum marianum****	Milk Thistle
Spartium junceum	Spanish Broom
Tamarix species	Tamarisk
Taxodium species	Cypress
Taxus species	Yew
Thuja species	Arborvitae
Trachycarpus fortunei	Windmill Palm
Tsuga species	Hemlock
*Ulex europea****	Gorse
*Urtica urens***	Burning Nettle
Washingtonia species	California/Mexican Fan Palm

** San Diego County native species
*** Introduced weeds to San Diego County

California Department of Forestry and Fire Protection (619) 590-3100
United States Forest Service (619) 674-2901
County Fire Service Coordinator (858) 495-5092
County Farm and Home Advisor (858) 694-2845
Insurance Information Network of California -- Brochures

(www.iinc.org <http://www.iinc.org>) or call (800) 397-1679

REFERENCES

- Combustible Vegetation and Other Flammable Materials Ordinance. Sections 68.401 thru 86.406 of the County of San Diego's Zoning Ordinance.
- California Department of Fish and Game (858) 467-4201
- U.S. Fish and Wildlife Service (760) 431-9440
- Protecting Your Property From Soil Erosion (www.sdcounty.ca.gov/dpw/docs/fire/homeerosion.pdf <http://www.sdcounty.ca.gov/dpw/docs/fire/homeerosion.pdf>)
- Homeowner's Guide for Flood, Debris, and Erosion Control After Fires (www.sdcounty.ca.gov/dpw/docs/fire/AfterFire.pdf <http://www.sdcounty.ca.gov/dpw/docs/fire/AfterFire.pdf>)
- Burn Institute (www.burninstitute.org)

Attachment E

O3a: Preserve Calavera Comments on Guajome Lake Homes DEIR (January 2025)

O3b: City of Oceanside Housing Element Table 22 (May 2023)

O3c: San Diego County RHNA Report on Oceanside (July 2024)

Preserve Calavera
Coastal North San Diego County

January 9, 2025
Robert Dmohowski, Principal Planner
City of Oceanside Planning Division
Sent via email to rdmohowski@oceansideca.org

Subject: Comments on Guajome Lake Homes DEIR

Dear Mr. Dmohowski,

This project is one of the worst examples of how the density bonus law is being used to destroy neighborhood character, ignore impacts on adjacent land uses—in this case a regional park, and ignore numerous environmental impacts . Furthermore, the density bonus law has been incorrectly interpreted to allow waivers that are not allowed. The project has substantial adverse impacts that have not been properly analyzed or mitigated. The key areas of concern include compatibility with the adjacent neighborhood, regional park, sensitive habitat, GHG, traffic, and housing. We realize that the density bonus law gives our city limited discretion about approving this project. But you still have the ability, and responsibility, to ensure that the project complies with density bonus law, environmental issues are addressed and that we end up with a project that will benefit our community, not harm it.

We believe the identified "environmentally superior" project is far better than the project that was proposed. Yet even that one has significant adverse impacts that have not been addressed, and still has essentially the same issues with compatibility with the neighborhood and adjacent park.

The following are specific comments on the DEIR for this project submitted on behalf of Preserve Calavera:

O3a-1

Project Description

- **Project fails to meet all of the stated objectives**
  Section 3.1 identifies 5 project objectives. The project fails to meet 4 of those 5 stated objectives. The issues with these objectives include:

  1. It does not achieve "functional compatibility" with other nearby land uses. This project is in the middle of an equestrian zone, an area with large lots and many that accommodate horses. It specifically is waiving compliance with the Equestrian Overlay Zone, will not accommodate horses or even provide equestrian access to Guajome Lake Rd that will become more difficult for safe equestrian crossing. It includes single family housing on small lots at a density of about 9/buildable acre whereas the nearby properties along Guajome Lake Rd have a single home on multiple acres. The proposed density is not at all consistent with the nearby properties. Furthermore, it will cause extensive impacts to the adjacent Guajome Regional Park.

2. This is not an in-fill site; infill sites have existing utilities. This site requires improvements to road and sewer extension as the area is currently on septic systems.
3. With only 4 affordable units provided it cannot claim to be "maximizing" affordable housing opportunities. Numerous other projects have built the minimum 10% on site affordable housing that was the standard when this application was filed. Furthermore, it is not a site "currently served by existing utilities, services, transit and street access." The project requires a 2,000 ' extension of the sewer line, there are no nearby services, and the closest transit stop is 1.3 miles. This location does not provide transportation options, is currently a high VMT area and that will only be exacerbated with this project.
4. The project is not consistent with two key elements of the Zoning Ordinance-: the Special Park Overlay District, and the Equestrian Overlay District. Both of these districts are part of the Zoning Ordinance and provide more specific requirements for the geographic area that includes the project site.

➢ **The concept landscaping plan does not adequately optimize the use of natives, restrict the use of invasives or assure permanent compliance with requirements for 12% tree canopy cover or OFD restrictions on plantings within 0-5" of building foundations**.
The project area's southwestern-facing boundary at Guajome Lake Rd is immediately adjacent to County of San Diego Guajome Regional Park. This part of the regional park has healthy Coastal Sage Scrub (CSS) plants including California Sagebrush (*Artemisia californica*), California Buckwheat (*Eriogonum fasciculatum*), Menzies' Goldenbush (*Isocoma menziesii*), Coyote Bush (*Baccharis pilularis*) transitioning into a riparian zone with larger plants including Toyon (*Heteromeles arbutifolia*), California Wildrose (*Rosa californica*), Mule Fat (*Baccharis salicifolia*), Red Willow (*Salix laevigata*), and Coast Live Oak (*Quercus agrifolia*). On the northeastern-facing boundary, there is a slope with more California Sagebrush (*Artemisia californica*) transitioning as it drops in elevation to another riparian zone that includes Western Sycamore (*Platanus racemosa*). Most native trees in the CSS habitat are dwarf trees/large shrubs due to low water but transition to taller trees once water is present such as in riparian zones. Therefore, the use of taller trees like Western Sycamore within the project site would require frequent irrigation to ensure tree health. Dwarf trees/large shrubs would require less irrigation and could go without irrigation once established, which typically is around 2 years.

O3a-1
Cont.

The project landscaping palette includes some recommended plants that are native to the project site, plants that are native to California but not native to the project site, non-native ornamental species, and one species that is on the emerging invasive plants watch list.

Specific comments on Plant Palette

1. Western Redbud (*Cercis occidentalis*) is a California native plant, but it is native to montane regions and not the project site. It is a small tree that is unlikely to provide a substantial canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended instead such as Toyon

(*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*).

2. Toyon (*Heteromeles arbutifolia*) is a recommended choice as it occurs on the SW-facing boundary with Guajome Regional Park and should be planted in lieu of several other plants currently listed in the project landscaping palette.

3. American Sweet Gum (*Liquidambar styraciflua*) is listed in the project landscaping palette. However, this tree is listed on California Invasive Plant Council (Cal-IPC)'s emerging invasive plants list for Orange County and likely applies to San Diego County. Source: https://chapters.cnps.org/oc/wp-content/uploads/sites/2/2024/01/doc.2024-Invasive-Report.pdf
It is recommended to remove this from the plant palette to prevent potentially introducing an invasive plant to the two adjacent riparian zones.

4. Western Sycamore (*Platanus racemosa*), is a recommended choice due to the presence of the tree already on the NE boundary. However, since the project site itself is not a riparian zone but a sloping hillside between two riparian zones, such a tree would need regular irrigation to become established and thrive given their water requirements. It is also the only tree native to the project site likely to provide substantial tree canopy over time. Also, since Western Sycamore hybridizes with non-native London Plane (*Platanus × hispanica*) in California, it is important to source Western Sycamore from reputable growers that have taken precautions against potentially hybridized seeds to prevent further genetic erosion of the species. Source: https://mossmatters.com/assets/pdfs/papers/johnson-platanus.pdf

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Cont.

5. Strawberry Tree (*Arbutus unedo*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*).

6. Blue Palo Verde (*Parkinsonia florida*) is a California native, but it is a small desert tree that is native to the inland deserts of Southern California. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*).

7. Mezcal Bean (*Sophora secundiflora* syn. *Dermatophyllum secundiflorum*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*).

8. Desert Willow (*Chilopsis linearis*) is a California native plant, but it is native to inland desert regions of California and not the project site. It is a small tree that is unlikely to provide a substantial canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended instead such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*). Red Willow (*Salix laevigata*)

9. Chitalpa (× *Chitalpa tashkentensis*) is a non-native, man-made hybrid tree with neither parent native to the project site. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*).

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Cont.

10. Sweet Bay (*Laurus nobilis*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*).

11. Willow Pittosporum (*Pittosporum phillyraeoides*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*).

12. Pink Trumpet Tree (*Handroanthus impetiginosus* syn. *Tabebuia impetiginosa*) is a non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore

(*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*).

13. Java Cassia (*Cassia javanica*) is a non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*).

14. Australian Willow (*Geijera parviflora*) is a non-native shrub/small tree that is unlikely to provide substantial tree canopy. Therefore, if a smaller tree aesthetic is the purpose of this selection, native large shrubs or dwarf trees would be recommended in lieu of this selection such as Toyon (*Heteromeles arbutifolia*), Lemonade Berry (*Rhus integrifolia*), Summer Holly (*Comarostaphylis diversifolia*), Laurel Sumac (*Malosma laurina*), Blue Elderberry (*Sambucus mexicana*), Black Elderberry (*Sambucus nigra*), Scrub Oak (*Quercus berberidifolia*), and California Wildrose (*Rosa californica*).

15. Mondell Pine (*Pinus eldarica*) is a non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*).

16. Holly Oak (*Quercus Ilex*) is non-native, canopy potential tree. Better canopy tree alternatives include Western Sycamore (*Platanus racemosa*), Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Velvet Ash (*Fraxinus velutina*), Tecate Cypress (*Hesperocyparis forbesii*), Southern California Black Walnut (*Juglans californica*), and Hollyleaf Cherry (*Prunus ilicifolia*).

O3a-1
Cont.

Other landscaping issues

The landscaping plan did not address the specific conditions of the OFD for plantings in the FMZ 0-5' from any building foundations as detailed in App O. See further comments in this letter under Fire Service.

There also is no mechanism specified to ensure the landscaping conditions, especially the requirement for a minimum 12% tree canopy cover are in place for the life of the project. This needs to be included in the conditions of approval with an enforcement mechanism specified.

Parking description includes 2 car parking stalls in garages for each residential unit, but no additional details.

Please provide additional information on availability of on-street parking and provisions for guests/vendors to park- not just residents in their own garages. This is especially important because of the numerous restrictions on parking described in App O.

- **Insufficient sustainability provisions**
  In section 3.2.5.1 the two sustainability provisions are part of the minimum requirements of state law and/or Building Code. For this sensitive location we would expect the developer to consider actions far beyond the minimum required by law. See other sections for more specific suggestions on how to reduce adverse impacts with improved sustainable design features.

- **Need more detail on compliance with Scenic Park Overlay District (SPOD) requirements.**
  These are mentioned in several places, but nowhere have we found any details that confirm compliance with the specific requirements for projects like this that are located within the SPOD. The DEIR specifically says they are in compliance with these requirements, while they are waiving all of the Equestrian Overlay Zone requirements. Compliance with standards in the SPOD for B Grading limitations, C View Preservation, D Building height, E Building materials and finishes, and H Signs are areas of particular concern.

- **Inconsistent description of waiver for retaining walls**
  Table 3.3-1 says that retaining walls are one of the waivers and notes these will not be plantable. But it is unclear if that is the only waiver related to walls. In other places it talks about softening the appearance of walls with no detail. In our experience plantable walls are often unsuccessful in achieving a reasonable amount of coverage with plants leaving them eyesores.

O3a-1
Cont.

- **Poor Circulation access and continued partial dirt road**
  In some places the project proposes to only improve the road frontage along its border which leaves the remainder of Guajome Lake Rd in its current dirt condition. In others, it extends the paving and road improvements to the west up to the intersection with Albright St. The project is adding hundreds of ADT to this road. The entire alignment needs to be considered for improvement, not just for cars but for safety of bicycle and pedestrian access as well. While city guidelines may not require the developer to address the condition of the entire road, the city needs to consider taking further action to ensure the road conditions are addressed to accommodate the changing conditions caused by this project. Other cities would do things like set up a thoroughfare improvement district and require all projects that access the road to pay their fair share towards such needed improvements.

Aesthetics

- **Fails to evaluate compliance with Guajome Park Sphere of Influence criteria**

This is the only section of the DEIR that mentions "sphere of influence," others reference the SPOD. Whatever it is called, the DEIR claims the project is consistent with the SPOD, yet it fails to provide any actual analysis of compliance with these conditions. This is in contrast to other land use criteria that are evaluated in great detail for General Plan Compliance as is shown on Table 4.10-1. Specific items in the SPOD that should be evaluated for aesthetics include:

1. F Structures not permitted on slopes abutting the park. In fact, the houses are all built on a slope abutting the park.
2. H Structures shall be oriented to protect views of the park and surrounding properties. The view analysis did not fully consider these views.
3. J transition area required between landscaped and natural areas. No such transition area is identified.
4. I Development shall integrate features such as landscaping, open areas and pathways with those of the park. There is no indication that this has been considered. In fact, access to the pathway within the park that parallels Guajome Lake Rd will be impacted by the project and safe integration between the trails on the north and the park will be a concern because of the increased volume of traffic.

➢ **No documentation of required review with General Plan Sphere of Influence**
On page 4.1-6 the DEIR concludes that the project is within the SOI and therefore would be **subject to** review for compliance. Based on being subject to review it concludes there are no conflicts. The DEIR is the document that should demonstrate the review has been done and the project is in compliance with all of the provisions of the SOI. No such review has been done. This remains a potentially significant impact that has not been addressed.

O3a-1
Cont.

➢ **Outdoor lighting fails to restrict impact to the on-site sensitive habitat**
Page 4.1-9 says outdoor lighting will be "directed downward to minimize light trespass on surrounding properties." This needs to also address light trespass within the property boundaries on the sensitive habitat (to comply with MHCP/SAP edge effect conditions).

Land Use

➢ **Fails to properly consider the relationship between General Plan and Zoning Ordinance**. OPR provides guidance for general plans. Chapter 9 of their guidance document Preparing, Integrating and Implementing the General Plan can be found here and is incorporated by reference https://lci.ca.gov/docs/OPR_C9_final.pdf

It says, "The success of a general plan, particularly the land use element, rests in part upon the effectiveness of a consistent zoning ordinance in translating the long-term objectives and policies contained in the general plan into everyday decisions." The two documents are interrelated. The DEIR has included detailed tables about compliance with provisions of the General Plan, but nothing about compliance with zoning.

The official Notice of Availability of Draft Environmental Impact Report specifically says "The 16.78 acre project site has a General Plan land use designation of Single-Family Detached Residential (SFD-R) and a zoning designation of Single-Family Residential-Scenic Park Overlay-Equestrian Overlay (RS-SP-EQ)." Both the general plan and zoning designations are key to understanding the land use allowed for this site. The City of Oceanside Land Use and Zoning Map Viewer also clearly identifies the project site as covered by both of these overlay districts.

➢ **Fails to properly consider the impacts of waiving Equestrian Overlay District**

The Equestrian Overlay District (EOD) is addressed in Article 28 of the City of Oceanside Comprehensive Zoning Ordinance. Under section 2802 it says "This article shall apply to all development projects except as otherwise provided for in this section." Three exceptions are identified, but none are applicable to this project. Section 2808 says that alteration of these standards is allowed "provided further that the general and specific purposes of this Article are achieved." There is nothing that allows waiver of the provisions of the entire EOD unless such alterations would still meet the purpose for which the EOD was established. The DEIR has done no such analysis of the impacts of the proposed wholesale waiver of this section. We note that it appears that an earlier version of the project accommodated horses in a designated common area, and it is still unclear what accommodation for horses, if any, is included with the project-as there is discussion about parking for horse trailers in App O.

Furthermore the EOD is intended to provide requirements that support equestrian use in a way that is compatible with the neighborhood and surrounding park. Eliminating this from one project in the middle of this zone could have multiple impacts on the adjacent properties and the function of this area to support equestrian use. How are horses supposed to move through this area in the absence of a path on this project, or crossings to the trail on the south side of Guajome Lake Rd. There are horses on the property on the west- how will they be able to leave their site safely? What path of travel will horses need to take to access the park?

O3a-1
Cont.

➢ **Inconsistency with prior litigation and past practices wrt waivers of EOD Conditions**

Around the time the EOD was being adopted, there was a lawsuit filed by the developer of Marlboro (sp?) Estates. This project was partially through the entitlement process and did not want to comply with the conditions of the EOD which they considered an illegal taking. There was a settlement agreement reached that allowed the development to proceed, but we believe with some of the conditions of the EOD included. Following adoption of the EOD there have been other projects that asked for waivers of EOD requirements. To our knowledge, in all cases, the city required extensive justification for the waivers and demonstration that the requested waiver would not compromise the purpose of the EOD, and the waiver was specifically approved by the city council. There is nothing in the DEIR that discusses any impact from this prior litigation, or explains why a standard process used for over 30 years to require justification of such waivers was ignored.

➢ **Waiver for Equestrian Overlay Zone is not allowed under state density bonus law as is claimed**.

There is absolutely no precedent or legislative support to waive specific overlay zones, such as proposed by this project. We refer specifically to the City of Oceanside's Zoning Ordinance Article 28 Equestrian Overlay. Considering this an incentive or waiver was never anticipated nor delineated in the detailed Density Bonus laws. Indeed their legislative purpose is to build houses on residential land *not take all local control away or destroy a city's ability to determine special overlay zones that benefit their residents.*

To point out how illogical that is, the City certainly wouldn't want to override either Base District Zoning regulations or the Overlay Zoning Districts. Indeed the purpose of the base district in residential areas Chapter 10 1010 G is to provide compatible development for public and semi-public uses, exactly what the Equestrian Overlay Chapter intends to do. They should be read together clearly.

Such a waiver would completely eliminate all local zoning at every level. Can you imagine waiving Industrial Zoning to build houses? Or removing the Senior Mobile Home Park overlay and gutting the protections that can give residents? There has to be a limit to what a waiver or concession can consist of. Using common sense such a waiver is *not a design standard in any interpretation of 'design standard'*.

So reading Chapter 10 and Chapter 28 together it is clear both chapters are to be applied, not one to the exclusion of the other. The Overlay Districts are to be compatible with the underlying residential zoning, not in conflict with them. Much as the Coastal Act cannot be overridden by current density bonus laws, nor should the Equestrian Overlay Zone. One protects the Coast and preserves it for the public while the other protects and provides for recreation, animal care and the health and safety and welfare and vistas of the area as well as protecting the adjacent neighbors' property rights to quiet enjoyment of their land and horses. The intent is very clear here.

O3a-1 Cont.

In reviewing the legislation and its analyses, there is no support or even a hint at waiving Overlay Zoning plans. Waivers and concessions are specified for density, lot size, setbacks, walls, parking, transit requirements etc*. All of those are design or development standards, not zoning standards.* Indeed design standards should be properly integrated with both zoning Chapters.

The rule of Statutory Interpretation generally states that one would read the Density housing rules as specific to housing only; it does not mention incentivizing or waiving or destroying local control of Overlay Zones. To put it another way, it is not logical to assume an Overlay District was ever contemplated as part of waivers and incentives. That is a stretch too far and the law cannot be enlarged in that manner.
Indeed, if something is not mentioned in a statute or law it is presumed to not be part of the interpretation of that law under the theory of *Expessum facit cessare tacitum.* Again,

nowhere in the legislative analyses or statements of intent is there any indication that building houses should override a local zoning overlay that provides for Equestrian uses. Again it's not logical or legal to eliminate or completely ignore the intent of the overlay district. Nor is it a logical interpretation to 'assume' overlay zones are included in the rather specific density housing rules. The clear meaning of the statute is to build housing, not destroy other local planning efforts. The clear meaning of Oceanside's zoning ordinance is to have the overlay district be compatible with underlying zoning, not eliminate it. We have not seen this type of zoning waiver in any other project in Oceanside.

Any development with a special overlay should and must be *compatible* with existing zoning regulations otherwise why have them at all? The intent of the density bonus rules is not to destroy quality of life and local planning efforts. There is no logical reason to exclude the equestrian aspect of this property other than to simply build houses and eliminate public benefits and overlapping plans for the area.

The intentions of Chapter 28 are extremely clear.

1. To provide for the public equestrian recreational opportunities and trails exactly in the Guajome area where this project is proposed. The project proposes nothing in this regard, no trails and teeny, tiny artificially created green space inside the project and not accessible for the enjoyment of the public.
2. To provide appropriate design standards for the safekeeping and protection of horses on said property. The project proposes to eliminate horses. There is no legal precedent upon which to eliminate that clear requirement and intent.
3. To enhance and provide an equestrian and rural atmosphere. Again this is completely destroyed/eliminated by the interpretation in the study that such intent can be waived.
4. To provide a pleasing and compatible relationship between buildings and a buffer between equestrian and non-equestrian uses. Again, the intent is clear. This area must provide horse amenities, trails, and open space. The proposal proposes to eliminate any equestrian uses. Again, this is not something that can be waived.

O3a-1
Cont.

Furthermore the intent of the **Ch 28 EO to be primarily is very clear in the language itself :**

"2804 Allowable Modifications to Development Standards Development regulations of the underlying base district shall be modified by the designation of an EQ Overlay District to accomplish the stated purposes of the EQ Overlay. Where conflict occurs between the provisions of the EQ Overlay District and base district regulations or any other section of the Zoning Ordinance, the EQ Overlay District shall control. "

Further the elimination of an equestrian atmosphere and horse keeping is sure to cause conflict with the adjacent neighbors who do keep horses to the west and to the south. Horses

can generally cause noise, dust and odors. The seminal case on nuisance, the Del Webb [1]case incorporated by reference clearly shows that moving residential uses near a cattle operation caused conflict, nuisance and reduced the value of the agricultural use and value of the land. In this case, adjacent homeowners may experience the same conflict with highly dense residential uses that are adjacent to their homes, yards and horses. The City should not sacrifice their home values and peace and quiet due to an inappropriate application of density bonus laws and waivers.

The conflict with the Guajome Regional Park Sphere plans and intentions will essentially limit or destroy the purpose of that plan. Again, there is not a shred of legislative intent that a new density bonus development should be able to negatively impact local control and regional planning nor remove public benefit from the uses of this land.

Last, the adopted Housing Plan demonstrates this land is not needed to satisfy the number of units required to be met. It was never planned for high density beyond what is delineated in the Equestrian Overlay chapter. In fact that says just the opposite- the land is to be built to retain all *the public benefits* as specified in the Chapter. That is why this property was never on the list of proposed zoning changes for greater density.

The developer is entitled to his bonuses and individual waivers, but not a waiver of the Equestrian Overlay District and they cannot waive the stated intention to preserve the benefits included within it. This project needs to study the impacts on the loss of these public benefits and the impacts on the surrounding properties including the regional park. Any specific waivers of EOD requirements must require justification as has been city practice on other EOD waiver requests.

O3a-1
Cont.

A recent HCD letter on another project (included as Att E) specifically discussed the ability of the local agency to request justification of requested waivers. That clearly needs to be done with this project.

- **Potential cumulative impacts of EOD waiver.**
  According to a resident of the EOD, at the time the original EOD was adopted there had already been several property use changes that compromised the existing equestrian oriented neighborhood. The EOD was adopted to protect the existing uses. Included within the EOD was the intent to improve connectivity of the horse trails, provide for safe crossing of roads, and improve access to Guajome Regional Park. None of those anticipated improvements actually occurred. There was neighborhood opposition when the initial waivers were requested for ADU's. Adjacent residents were concerned that there would be limitations placed on their future property use as things like corrals could not be located

[1] [1] Spur industries Inc. versus Del E. Webb Development Co 108 Ariz. 178, 494 P.2d 700, 1972 Ariz. 4

within so many feet of a residence and now the adjacent property had two residences on site instead of one. While the city required justification for waivers, they were approved. And as had been anticipated, the neighborhood concern that such waivers would make it harder to continue horse use in the neighborhood proved to be true. The consequence was that over time a number of properties discontinued horses on site, especially in Jeffries Ranch. This became the start of a long slow process that reduced horse use in the neighborhood that had special conditions added that were supposed to protect these uses. All of these previous waivers were for small modifications, such as adding an ADU, and none included waiver of all of the provisions of the EOD.

It is reasonable to expect that waiving all of the conditions of the EOD, with no requirement to justify such waivers, will adversely impact the function of the EOD and ultimately will result in more such projects. All of the EOD property owners that supported the EOD, and many of whom provided additional funding to maintain the horse trails will have the use of their property compromised, further exacerbating the future rate of conversion of these properties from one that supports horses to one that does not.

Furthermore, adding dense housing next to a horse corral is expected to result in the common kind of nuisance complaints that occur near agricultural land uses. Residents are aware at the time that they are near horses. But they still complain about the smell and other impacts from their presence. To protect agricultural areas from such complaints it is common to adopt Right to Farm ordinances. There is nothing similar to this to protect these horse properties.

O3a-1
Cont.

Additional mitigation is needed to protect the intent of the EOD from such cumulative impacts. This should include consideration of a Right to Horses ordinance,similar to those used for Right to Farm ordinances in agricultural areas. It should also include the requirement to justify the EOD waiver and require explanation of how it will not adversely impact the intent and purpose of the EOD.

Air Quality and Greenhouse Gasses (GHG)

- **Computation/typo errors in App B section 2.4.2.1**
  Text says grading will occur for one month from "July 24 to August 23." It appears this was intended to be "July 23 to August 23." This describes a project of 84 units with 9 affordable whereas the DEIR project description is 83 units with 4 affordable. This inconsistency should be noted with a statement about how it impacts the final computation (we expect this would be negligible but without correction it remains an inconsistency).

  The delay in project completion could have a significant impact on the compliance with VMT/capita threshold. The DEIR notes an 18 month construction schedule and on page 33 says it will be operational in 2024. However, the project has yet to secure entitlements which reasonably would take at least 6 months, followed by 18 months construction. It therefore could not be operational until 2027 at the earliest. Since VMT/capita is required

to decrease over time this results in the wrong threshold being applied, i.e. 2024 instead of 2027 which would require additional emission reductions.

- **Fails to properly comply with conditions of the SDAPCD**
  For example, dust control strategies in section 1.5 says "Speeds on unimproved roads shall be reduced to less than 15 mph." Speeds are limited to 15, not less than 15. Furthermore, dust control measures are only applied to construction although the dirt road will continue to cause dust issues throughout the life of the project. Page 10 of Appendix B specifically identifies "dust stirred up by vehicles traveling on roads." as a source of dust pollution. On page 11 it says Visibility Reducing Particles are those that "obscure viewshed of natural scenery." (Applying to PM 10 and PM 2.5.) This dirt road is adjacent to natural lands of Guajome Regional Park and even a casual observation shows substantial dust impacts to the viewshed—just from a single car driving along the street. Furthermore, there is no restriction to 15 MPH to reduce fugitive dust. Page 13 identifies 'parks and playgrounds " as land uses with sensitive receptors, yet the adjacent Guajome Regional Park has not been evaluated for impacts on such sensitive receptors. On page 18 it notes that the recommendations of the 2005 SDAPCD additional guidance re control of PM (because the region is a nonattainment area). This includes source control measures to address "unpaved roads and windblown dust." All of these dust control measures from the SDAPCD need to be brought forward into the project design and conditions of approval.

- **Error on page 33 Table 8 where it says VOC threshold is "Not" exceeded**
  This appears to just be a significant typo as the numbers show the threshold is exceeded and the text that follows discusses the cause and mitigation proposed to address this.

O3a-1
Cont.

- **Unclear analysis of impacts, both for project and 90 townhome alternative**
  Page 28 of App B notes natural gas use for space and water heating. This is one of the sustainability measures that should be addressed by making this an all-electric project. That would reduce fossil fuel used, improve indoor air quality and safety and reduce construction costs.

- **Fails to identify conflicts with appropriate Air Quality Plan (AQ)**
  The adopted AQ assumes that growth is consistent with the SANDAG growth projections. On page 30 of Appendix B, it explains this as complying with the need for 5,443 housing units by 2029. But that fails to account for housing by income level which is also a key part of the growth projections. This project proposes to add only 4 affordable housing units, although Oceanside is far short of achieving the housing for that income level. It also fails to note that the city is already projected to exceed the target for above moderate housing. Furthermore, above moderate housing units consume more energy and emit more GHG than the smaller units built for lower income levels. As further discussed under Population the project is not consistent with SANDAG growth projections.

- **DEIR references the 2008 CARB Scoping plan but should be updated to the 2022 version**.

The current version provides much more specific guidance for local jurisdictions. But even the 2008 version includes the bottom-line goal of achieving 6 MT/capita by 2030 which is necessary to meet the threshold of SB32 and AB 197 for 40% below the 1990 levels by 2030. The DEIR has not evaluated compliance with this key goal from the CARB Scoping Plan.

- **inconsistent statement about gas fired fireplaces**
  Page 29 of App B says that PDF AQ-1 Restricts both woodburning and natural gas fireplaces. But the actual AQ mitigation measure AQ-1 only specifies low VOC materials, and AQ-2 only restricts wood burning and not natural gas fireplaces. It is unclear if natural gas fireplaces have been included in the emission calculations or not. If not, this potentially could result in greater GHG emissions, particularly for cumulative impacts.

- **Inaccurate statements about housing compliance**
  Page 31 notes that the majority of these housing units will be above market rate. Other places in the DEIR discuss housing compliance, particularly related to RHNA housing needs. What this ignores is that addressing housing needs is not just achieving the total number of housing units, it is achieving the number of units for each income level. Oceanside already has exceeded the need for above moderate housing so this project is not on a trajectory of compliance with housing goals as it will result in an even greater excess of high cost housing.

- **The CAP Checklist has not been provided/verified and is not allowed as CEQA analysis of impacts**
  The DEIR assumes consistency with the CAP Checklist is sufficient to claim there are no significant GHG impacts, yet the Checklist has not been included with the DEIR documents provided, nor is there any indication that it has been signed/verified by staff. The City of Oceanside Climate Action Plan Consistency Checklist says the Checklist is supposed to be submitted "concurrently with the initial entitlement application." It further states the Checklist is to be used for CEQA review of new developments. However, it also states that use of the Checklist is only sufficient for projects that "meet one or more of specific locational criteria." The following includes shortened version of each of those locational criteria and our conclusions about it being met:

    1. Within a Smart Growth Opportunity Area – No
    2. Within 1/4 mile of a priority TOD – No
    3. Consistent with current land use and zoning – No. Proposed project is not consistent with current zoning. In fact, it is requesting a waiver of many zoning conditions (EOD) and it has violated others (SPOD) that have not been properly identified.
    4. Analysis that proposed project would produce fewer GHG than current land use-consistent with surrounding zoning district and verified by a third party expert. – No claim was made nor was such analysis done.

O3a-1 Cont.

Since the project fails to meet any of the identified location criteria further analysis of GHG is required. The Checklist further specifies that this includes VMT analysis, consistent with the provisions of the City of Oceanside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and (VMT) and Level of Services. Table 5 of those guidelines further specifies that residential projects that generate 500 or greater ADT are required to meet the threshold of a 15% reduction of VMT from the regional average.

No such analysis has been done. The project is not in compliance with the CAP provisions for CEQA analysis of GHG impacts. Since the project includes no features that would be expected to result in a VMT reduction this remains a potentially significant impact that has not been properly analyzed or mitigated.

- **Project still shows a small amount of natural gas use**
  We would like to see this clearly defined as an all-electric project with no natural gas infrastructure and with the inclusion of additional Title 24 voluntary measures.

- **No assurances of Checklist compliance over the life of the project**
  There needs to be a mechanism that ensures the minimum 22% pervious cover and 12% tree canopy cover provided initially are maintained throughout the life of the project. This mechanism needs to be specified in the conditions of approval.

- **There are no plans to accommodate increased EV use over time**
  The project meets the current minimum requirements for EV hookups/charging. But there is no discussion as to how this will be addressed as California moves to 100% EV's. GHG analysis is a cumulative impact so this needs to be addressed for the life of the project that includes responding to this known change in future conditions.

O3a-1
Cont.

Biological Resources

The project is not in compliance with several provisions of the Oceanside SAP
Several of these specific issues are discussed below. But the key issue is that failure to comply with the SAP results in potential adverse impacts to biological resources-- direct impacts, indirect and cumulative.

- **Impacts to sensitive habitat are not allowed to accommodate Fire Management Zones (FMZ)**
  Per the MHCP those impacts should all be within the development footprint. There is no figure that shows exactly where, and by how much the project has failed to comply with requirements of the 0- 30' FMZ 1- just text that says the FMZ varies from 0-30' in spite of the fact that it shows a consistent 30 ' width for this zone on Figure 3.

Page 1 of App C says "... southern FMZ will include …between 19 and 70 feet of on-site zone 2 thinning for fuel modification, and off-site equivalent fuel modification." What exactly is this "equivalent" off-site fuel modification? And where does this occur?

Furthermore the FMZ does not appear to properly identify impacts to adjacent lands. Table 5 of App C identifies .31 acres of impact from the improvements to Guajome Lake Rd. It appears that at least part, if not all, of these off site impacts are affecting Guajome Regional Park. The analysis of these offsite impacts should discuss how they affect the biological resources in the park- which may be greater than just accounting for the direct impacts- especially at the low proposed mitigation ratios (.5:1)

- **Impacts are not specified to existing hardline preserve**.
  The text identifies that there is overlap with what is identified as hardline preserve in the MHCP/SAP- but there is no figure that identifies where this occurs or any details about the extent of this. The SAP specifically requires 90-100% of hardline preserve to be permanently protected and per the DFW comment letter on the NOP since this is identified as a Focussed Planning Area(FPA) in the MHCP there should be no impacts within this zone. Without knowing exactly how much of this existing hardline has been impacted it is impossible to determine if this standard has been met. But it appears this is not consistent with the MHCP/SAP.

- **Ignored WLA recommendation for impacts to be mitigated on site.**
  The WLA's recommended that mitigation occur on site because this is part of the MHCP FPA. While there has been substantial avoidance of on-site impacts, mitigation is still proposed at an offsite area, with no explanation of how this is equivalent to what was recommended.

  Furthermore, the sensitive habitat that has been avoided is not being treated as mitigation. There is no active management or monitoring proposed, only minimal actions specified for the HOA, and no endowment that ensures that these resources will in fact be preserved in perpetuity.

- **Fails to comply with buffer requirements of the SAP.**
  The SAP identifies requirements for a 50' biological and a 50' planning buffer from the edge of the riparian habitat. The text implies these buffer conditions have not been met, but fails to provide the details that show exactly where, and to what extent, such reductions in the buffers have been made. Page 9 of App C concludes reductions in this buffer are acceptable if approved by the city . It says "However, because the subarea plan has not been approved by the city, these buffers and setbacks are subject to reduction based on approval by the city." The project is still subject to conditions to be included after consultation within the WLAs' , both for habitat impact and Streambed Alteration permits. MM Bio 11 specifically says the project will comply with the conditions of future Section 10 consultation (for habitat impacts) which is not consistent with this conclusion.

O3a-1
Cont.

On page 31 it says that the landscaped manufactured slope will serve as part of the buffer and "avoids the need to thin in the habitat." Again, this area of impact has not been properly identified. The DEIR has failed to fully identify, analyze or mitigate for impacts to the buffers. This remains a potentially significant adverse impact.

➢ **The correct mitigation ratio for impacts to CSS per Table 5-2 of the SAP is 3:1, not 2:1 as proposed**.
The referenced footnote 6 to Table 5-2 appears to be the justification for reducing this requirement but it is not applicable to this project in the Off-site Mitigation Zone. The correct mitigation ratio for occupied CSS habitat is 3:1.

➢ **The DEIR fails to discuss impacts on local wildlife movement corridor**
The SAP requires evaluation of project impacts on local wildlife movement corridors. The DEIR only evaluated impacts to the regional north/south wildlife movement corridor identified as the Wildlife Corridor Planning Zone in the SAP. Wildlife typically move along riparian corridors, and between riparian corridors and large open space areas like Guajome Regional Park. In Oceanside the San Luis Rey riparian corridor and others are important for local east/west wildlife movement. The DEIR has failed to discuss any such impacts to local wildlife movement corridors caused by the project.

The project proposes direct impacts to CSS on site. One of these patches included CAGN nesting. The DEIR has failed to discuss how the project will impact future CAGN dispersal, a specific kind of local wildlife movement corridor.. CAGN can move through a landscape with patches of CSS, based on line-of- site and other conditions. How will eliminating these CSS patches effect dispersal along the northern part of the site? What is the distance between CSS patches along this riparian corridor if those on the project site are impacted? On Page 30 it assumes the remaining riparian corridor provides adequate habitat linkages for CAGN but there is no analysis that supports that conclusion. O3a-1 Cont.

Where wildlife movement corridors are already compromised (like they are in the northern riparian area on site), it is important to provide redundancy. Having more than one way to move through a landscape increases the success of dispersal. See further discussion of factors affecting CAGN dispersal included in the study Ca Gnatcatcher Corridor Study Evaluation of the Northern Connector Through the Wildlife Corridor Planning Zone in the City of Oceanside CA, incorporated by reference.

➢ **Please clarify where the Quarry Creek mitigation bank site is located and remaining credits**IR says the direct impacts to both CSS and NNG will be mitigated through the creation of 6.64 acres of CSS at the Quarry Creek mitigation bank. We are not aware of the establishment of this mitigation bank. If it is within the Quarry Creek development in the city of Oceanside this area is not within the boundaries of the WCPZ. For this project these direct impacts are required to be mitigated within this zone.

- **Insufficient management of the sensitive habitat proposed to be maintained by the HOA.** The DEIR states that the project avoids impacts to riparian, CSS and NNG habitats and that these areas will be managed by the HOA to ensure "no trespassing into the natural habitat and that they are kept free of trash." Those two items alone are insufficient to ensure the biological integrity of this sensitive habitat. Full edge effect conditions should apply to this area and be the responsibility of the HOA to monitor and enforce.

- **Indirect impacts to sensitive habitat have not considered operation of the project** The project only discusses potential construction indirect impacts, not those from operation of the project. MM Bio 3-10 also only addresses construction impacts and not the on-going permanent impacts that will occur from operation of the project. Given that the project site includes what is, and will continue to be, hardline preserve, the edge effect conditions from the MHCP need to be included as project conditions. These conditions were routinely used by the City for several years but have not been addressed with this project. Failure to address these results in potential indirect impacts that have not been mitigated. These standard edge effect conditions are included as Att A and should all be included with this project.

- **MM Bio-2 needs to also address locally invasive plants** The DEIR does specify that potential landscaping impacts will be addressed by insuring no invasive plants are included based on the CAL- IPPC list. In addition to that, the San Diego Natural History Museum publishes a list of plants that are locally invasive. This list needs to also be included.

O3a-1
Cont.

- **MM Bio 11 illegally defers mitigation to future Section 10 consultation.** Of course the project will need to comply with numerous future actions that have not yet been specified, for example changes to the Building Code. But the DEIR analysis is supposed to identify all such known impacts and provide proper mitigation with the EIR, not defer this to a future action. This is of particular concern because such consultations are not part of a public process and there is no opportunity for the public to evaluate whether any proposed modifications are sufficient . This sounds like there is an expectation that there are impacts that have not been adequately identified, analyzed and mitigated in the DEIR and instead of doing that it is proposed to just include this generic mitigation measure to comply with these in the future.

- **The DEIR has not identified potential direct or indirect impacts on Guajome Regional Park from the modifications to Guajome Lake Rd**. Throughout the DEIR it has failed to properly consider direct and indirect impacts on the park. The DEIR notes that Guajome Lake Rd will be realigned and widened and that this will impact the park. Yet there is no figure that shows the extent of this impact or analysis of the potential impacts.(Only a table that indicates the number of acres impacted.) There is extensive sensitive habitat within the park. Both the construction and operation of this

realigned road, with potentially higher traffic volumes, could impact the biological resources of the park.

Noise

- **Please restrict construction to M-F**
  Saturday construction can be allowed by permit. But considering the project is adjacent to a regional park, Saturday construction should not be allowed.

- P**otential off site noise impacts were not properly identified or mitigated if needed**
  Figure 2 Site Plan does not indicate any off-site construction impacts. There will be impacts from the improvements of Guajome Lake Rd for 420' along the frontage to the park, into the park, the extension of paving to the west of the project up to Albright St, and the estimated 2,000 foot sewer line extension to the project site. The analysis needs to also include these potential off site noise impacts.

- **Private sewer lift station noise not evaluated**
  App N Sewer System Analysis identifies an on-site sewer lift station. It appears this was added after the noise analysis was done and it therefore was not included in the noise analysis. These stations can be very loud and may require mitigation.

- **We did not see restrictions on the type of lawn equipment to be used, which can be a major source of excess noise (and GHG)**. Please include proper analysis and mitigation if needed for this potential impact from lawn equipment.

O3a-1
Cont.

Hydrology

- **Inaccurate project description**
  App H says the site is an existing vacant lot covered in natural vegetation. In fact, as reported elsewhere in the DEIR, there is an existing single family home and shed on site and most of the vegetation on site is not natural. On page 17 of 390 it says the paving of Guajome Lake Rd is only along the project frontage while in other places paving extends past the project to the west. On page 20 of 390 it says the majority of the storm water will travel south across Guajome Lake Rd through culvert . This does not seem consistent with the details for drainage shown in App H and I discussed further below.

- **Unclear statements about existing hydrology**
  Page 1 of App H says basin EX-1 "appears " to output to Guajome Lake Rd at low spot…" Page 2 says Basin EX-3 "appears to continue northwest to outlet to Guajome Lake within Guajome Regional Park." The hydrology technical studies are expected to confirm actual existing conditions—not just conclude what "appears" to be the case. There is also no discussion about any historical issues with site run-off, particularly to the adjacent Guajome

Regional Park. Is there obvious erosion around the road low point or the culvert under the road?

- **No figure showing basin drainage post project**
  Pre-project conditions are shown that identify the three drainage areas of the site. Text says this basic drainage pattern essentially remains post project. But there is no site plan that shows post project areas of drainage and what flows to the identified basins and structural BMP's. While the detailed site plan shows the location of these it does not show the limit of post project drainage areas in order to confirm this remains substantially similar. App A to App H provides details for each of the three areas as summarized here:

Area	Pre Project		Post Project	
	Acres	CFS	Acres	CFS
NW	4.14	7.77	5.28	7.66
SW	4.34	8.35	4.76	8.29
NE	1.92	5.15	.38	1.01
Total	**10.4**	**21.27**	**10.4**	**16.96**

  This indicates the overall volume of drainage has declined substantially particularly the area that drains to the NE. Please provide further clarification of this apparent inconsistency.

- **Required Justification for use of run-off coefficient of .35 for undisturbed natural land has not been provided**
  App A to App H includes Table 3-1 from the SD County Hydrology Manual page 3-6. This includes the runoff coefficient for identified land uses. It adds a qualifier to the use of .35 (0% impervious cover) that it must be undisturbed in perpetuity and that "justification must be given that it will remain natural forever." We find no such justification nor do we find anything that assures all of these areas will remain impervious in perpetuity. Both of these issues need to be addressed for this analysis to comply with the requirements of the Hydrology Manual and for this coefficient to be acceptable to use.

O3a-1 Cont.

- **Boiler plate information provided for structural BMPS**
  For example, page 59 of 390 in App I shows an example from 43rd St and Logan Ave. in San Diego. Further explanation is needed to clarify what changes, if any, are proposed to the generic information provided to make them specific to this project.

- **Error on Site Design BMP Checklist**
  Page 28 of 390 has checked "Yes" natural lands are conserved. The text specifically says that arroyo willow riparian forest and coastal sage scrub on the northern portion of the site will not be impacted. This is in conflict with the BTR that shows there are impacts to coastal sage scrub.

➢ **Failure to consider impacts of increased traffic on dirt road**
Guajome Lake Rd already experiences washboard conditions from winter rains. The project proposes to leave a portion of this road as is, while greatly increasing the traffic volume. This is likely to result in increased erosion impacts on this road that need to be addressed. GThis is further support for paving the remainder of the road if this project proceeds instead of leaving a portion of it dirt.

Transportation

➢ **The DEIR has not adequately assessed compliance with state and local requirements to consider "complete streets" with the proposed modification to Guajome Lake Rd**.
The City of Oceanside General Plan Circulation Element (CE) page 8 states: "It is recommended that all transportation projects, new or retrofit shall be reviewed for opportunities to improve safety, access and mobility for all travelers and recognize pedestrian, bicycle and transit modes are integral elements of the transportation system." Appendix K the draft LTA says the project will build the missing sidewalk only along the project frontage, and only on the north side of the road. There will be no bike lanes or facilities. The nearest transit stop is 1.3 miles. This clearly is not designed as a "complete" street.

➢ **Unreasonable assessment of current and cumulative traffic impacts.**
We did not find current traffic counts confirming existing conditions. Simple observations and reports of residents along this reach of Guajome Lake Rd reveal that there is substantial cut-through traffic. This includes school pick up and drop offs for Guajome Crest Academy, among others. While the project itself might not reach the nexus to pave this entire dirt section of the road, the city certainly should. While there are no other projects currently in the approval process that would access this reach of Guajome Lake Rd, essentially all of the existing parcels along the roads off of Guajome Lake Rd have only this single way in or out. There is a potential for a substantial increase in residential units from all of these roads, with or without density bonus additions.

O3a-1
Cont.

➢ **The DEIR has not confirmed that the proposed roadway improvements to Guajome Lake Rd are consistent with the adopted Circulation Element**
Page 13 policy 3.7 says the city "shall adopt special alignment plans when 'standard equal-sided widening is not adequate for future needs or where specific conditions exist that require a detailed implementation plan." It appears the project is proposing widening on only one side yet the justification for this has not been provided- especially since the widening is only on the park side of the road. Policy 3.21 requires landscaping along redesigned roadways-which has not been discussed.

➢ **Unclear if it meets all of the CE design criteria for a 2-Lane Local Road shown on page 24, Table 3-1**

TABLE 3-1
CITY OF OCEANSIDE STREET DESIGN CRITERIA

Design Elements	6-Lane Prime Arterial	6-Lane Major Arterial	4-Lane Major Arterial	4-Lane with TWLT Secondary Collector	4-Lane Secondary Collector	2-Lane with TWLT Collector	2-Lane Collector	2-Lane Local	Cul-de-Sac Street	Private
Volume Capacity	60,000	50,000	40,000	30,000	25,000	15,000	10,000	2,200	Less than 200	Less than 500[2]
Design Speed	60 mph	55 mph	55 mph	45 mph	45 mph	35 mph	25 mph	25 mph	25 mph	25 mph
Stopping Sight Distance[1]	580'	500'	500'	360'	360'	250'	200'	150'	150'	125'
Minimum Spacing of Intersections[3]	2,600'	1,200'	1,200'	600'	600'	300'	300'	200'	NA	200'
Right-of-Way[4]	124'	124'	100'	84'	74'-80'	70'	60'-70'	56'-60'	56'	VARIES
Curb-to-Curb Distance	104' 16' Median	104' 16' Median	80' 16' Median	64'	54'-60'	50'	40'-50'	36'-40'	36'-40'	40'-36' 32'-28'[5]
Minimum Traffic Index	10	10	9	8	8	7	6	5	5	5
Minimum Structural Section[6]	6AC/8AB	6AC/8AB	6AC/6AB	5AC/6AB	5AC/6AB	4AC/6AB	4AC/6AB	3AC/6AB	3AC/6AB	3AC/6AB
Access to Adjoining Property	None	None	None	Where no other access is possible	Where no other access is possible	Where no other access is possible	Limited Access	OK	OK	OK
Minimum Horizontal Radius Without Superelevation	1,000 2,200	1,000 1,800	1,000 1,800	750 1,100	750 1,100	500 600	350 N/A	200 N/A	200 N/A	200 N/A
Maximum Grade	6%	8%	8%	8%	8%	8%	10%	12%[7]	12%[7,8]	12%[7]
Minimum Grade	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%
Maximum Intersection Grade	3%	3%	3%	4%	4%	5%	5%	5%	5%	5%
Curb Return Radii	35'	35'	35'	35'	35'	30'	30'	25'	40'	25'-35'
Street Lights Location per Standard Drawing No. M-4[9]	30,000 lumen 200' staggered	30,000 lumen 200' staggered	30,000 lumen 200' staggered	30,000 lumen 250' staggered	30,000 lumen 250' staggered	9,500 lumen 250' one side or staggered	9,500 lumen 250' one side or staggered	9,500 lumen at all intersections 250' spacing one side of street	9,500 lumen at mid-block if less than 200'	9,500 lumen at all intersections 250' spacing one side of street

Footnotes:

➢ **The project has waived the requirements of the Equestrian Overlay Zone, but that does not specifically address all of the equestrian related requirements in the CE**

6.2 Equestrian Facilities includes an objective to "preserve and enhance trails in the vicinity of Guajome Regional Park." Policy 6.11 expands on that to include "the city shall protect and maintain the equestrian trails as a form of recreational opportunity as part of implementing the city's Recreational Trails Element." It also specifically mentions providing safe crossings to Guajome Park. The project has not complied with these requirements from the CE, yet it claims to be consistent with the General Plan.

O3a-1
Cont.

The Recreational Trails Element is a sub element of the CE, was adopted in 1995 and reformatted in 2002. Page 9 of that document describes the Equestrian System component of recreational trails. This includes objective 6.1 to implement the Equestrian Circulation Master Plan shown on Figure RT-2. Goal 7 on page 12 is to "Enhance equestrian trail facilities in the Equestrian Overlay District. This includes three specific objectives: to continue access to Guajome Park, strive for master planned connections to the park, and to develop additional design standards. All of these have been ignored, contributing to impacts on the park.

➢ **Failed to consider safety impacts of horses crossing Guajome Lake Rd.**

Car/ horse collisions and avoidance of such collisions are dangerous for both the horse and rider and the occupants of the vehicle. These unsafe conditions already exist since no actual horse crossings have been provided in spite of the number of horses accessing the park from the north side of Guajome Lake Rd. With the proposed extension of Melrose Rd several years ago there was a requirement to provide special controls to activate crossing

signals that could be accessed by a rider on a horse. The incidence of such potential crossing conflicts is expected to increase substantially given the increased volume of traffic on Guajome Lake Rd. The project needs to specifically address the safety of potential conflicts with horses crossing the road.

- **Project is in a high VMT area and exceeds the regional average VMT/resident**
  Appendix C to Appendix L states the census tract the project is located in has 19.1 VMT/Resident and the regional mean is 18.9 VMT/Resident. The project has not properly evaluated its GHG impacts and its location within an area with high VMT makes this even more concerning.

- **Issues with draft Local Transportation Assessment dated April 19, 2023**
  This says the project will build missing sidewalks, but this is only a single sided sidewalk and appears to only extend along the project frontage with no sidewalk connections past the project frontage to the east or west. No bike lanes or facilities are provided and the closest transit stop is 1.3 miles away. The cumulative impacts conclude there are no other projects adding traffic to this reach of Guajome Lake Rd. However this fails to consider that many of the roads in this area have a single access to Guajome Lake Rd so any increase in intensity of use on all of those roads will result in increased traffic on Guajome Lake Rd. The presence of so many roads with a single access is a major factor to consider- both for general circulation and for impacts when there is a need to evacuate.

- **Unknown if applicant has coordinated with adjacent jurisdictions as is required**
  Per page 7 the applicant is responsible for this coordination. This would include both the county of San Diego and city of Vista, two jurisdictions that will also be impacted by increasing traffic and roadway construction. Please provide verification that this required coordination has taken place.

O3a-1
Cont.

- **Issues with compliance with ECAE Policies of the General Plan**
  ECAE Policy 1c-3 requires outreach and educational materials promoting energy efficiency at point of sale. Policy 2c-4 requires the city to ensure improvements are consistent with the city's Complete Streets Program. There is no mention of compliance with these policies.

Energy

- **Construction energy use fails to include off site construction of road and sewer**
  These off-site impacts should be consistently included in the DEIR.

- **Failed to include the required VMT analysis**
  This section and the GHG section both conclude that the project is exempt from further analysis of GHG as it complies with the Checklist and based on the false claim that it meets one or more of the four exemption criteria. Specifically that is because the project is considered to be "consistent with current land use and zoning." Great detail is provided in

multiple locations about compliance with Land Use goals and policies in the General Plan including Table 4.10-1. However, there is no such analysis for compliance with zoning requirements. Page 4.10-9 discussion of compliance with the Zoning Ordinance merely goes through the details of computations for density bonus. In fact, the project specifically waives compliance with the zoning requirements for the Equestrian Overlay Zone. It can't both waive compliance and claim to be exempt from further energy analysis based on the compliance that has been waived. In addition, there has been no documentation of compliance with numerous conditions of the SPOD as discussed in these comments. We believe the project also fails to comply with numerous provisions of the SPOD which further invalidates the claimed exemption based on zoning compliance.

The DEIR has falsely claimed it is eligible for an exemption from further analysis of GHG. Further analysis as described in the CAP is required in order to determine that there are no significant impacts from GHG.

- **The project includes substantial use of natural gas and is not in compliance with 2022 CARB Scoping Plan**
  The buildings are projected to use 669,031 kWh of electricity and 2.37 million thousand BTU natural gas/year. We found no details on what the natural gas is being used for. But residential projects are the easiest land use to support all electric buildings. Eliminating the use of natural gas reduces construction costs, improves safety, improves interior air quality and reduces GHG emissions. The 2022 CARB Scoping Plan includes measures for decarbonization of residential and commercial buildings. The standard for residential land uses is "all electric appliances by 2026." The project will not be operational until 2027 and should comply with this standard.

O3a-1
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- CAP Checklist has a number of issues discussed under GHG.

Geotechnical

- **Drainage description is not consistent with hydrology report**
  App G says " Surface drainage is directed toward the southwest and northeast on their respective ridge sides." App H Hydrology review says the majority of the drainage is to the southeast, across Guajome Lake Rd.

- **Private on site sewer lift station not evaluated**
  Page 11 Section 5.3.1.6 notes "sewer utilities have not yet been designed." It further states such future details would require further review to ensure BMP's are not within 10' of sewer utilities. Further analysis of this is needed based on the design of the sewer system shown in Appendix N.

- **Geotechnical report recommendation are not properly carried forward into the DEIR**

The report states that further review at various stages of the project is needed to ensure there are no adverse impacts. The DEIR failed to identify the need to comply with geotechnical recommendations or the need for further review. These impact both construction and operation of the project. For example, under landscaping maintenance it notes the importance of avoiding overwatering. It also says "An abatement program to control ground-burrowing rodents should be implemented and maintained. This is critical because ground burrowing rodents can decrease the long- term performance of slopes." It also says to avoid landscaping next to foundations. The DEIR needs to properly conclude that there could be significant impacts unless the recommendation of the Geotechnical report are complied with. This needs to be a formal Mitigation Measure with accountability for performance and an enforcement mechanism.

Public Services

Water Service

- **Unclear if additional demand has been included for fire sprinkler system in each residential unit.**

- **Unclear what is "public" vs "private**
  Figure 3 shows the 2 8" waterline connections to the existing 10" main along Guajome Lake Rd, as well as the line on the interior street. Does all of this become part of the public infrastructure once built? We would like to see a summary of infrastructure additions and the costs of their construction and on-going maintenance that will be paid for by the taxpayers of Oceanside, and not this developer.

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Sewer Service

- **Off site impacts for sewer system extension from Old Ranch Rd are not accounted for.**
  Figure 3-2 in project description only shows the paving of Guajome Lake Rd to Albright as an off site impact, not the 2,000 foot sewer line. Also, the construction Air Quality impacts have not accounted for this sewer extension. We do not see anywhere that the sewer system extension has been addressed in potential project impacts.

- **Need to address in perpetuity requirements to manage any private sewer system component**
  The lift station is within the project footprint and is identified as "private." There needs to be conditions that ensure adequate management of this facility. Will that be the responsibility of the HOA and what is the enforcement mechanism?

Fire Service/Wildland Fire

- **Inconsistent project description**

Page 5 of App O (and others) says the project is for 84 single family residences with 9 affordable whereas the DEIR project description is 83 with 4 affordable. There needs to be a consistent project description, both for the number of units and for off-site improvements. This is very critical as the project does not comply with standards for Fire Management Zones (FMZ) and is proposing alternative mitigation. Without a clear description of the amount and location of the compromised FMZs it is not possible to determine that this proposed mitigation is sufficient. Figure 3 text says the FMZ Zone 1 Irrigated area is 0-30' wide. The figure shows no area of 0 width. FMZ 2 Non-irrigated text says it is 30-70' but the Figure shows lots of areas that appear to be less than 30' wide. Furthermore section 4.18 Wildfire discusses a FMZ of 0-5' from building foundation, with very specific restrictions on that zone. Those include irrigation and limited plant use and plant height from 6 -18". That zone is not mentioned in App O, shown on Figures that describe the FMZs, nor is it found on the landscaping plan. Please provide a consistent description of all of the FMZ requirements including this 0 - 5 ' zone, include on the related figures, and include provisions for enforcement. We are not aware of HOA's or OFD having inspection programs that review the 5' perimeter around residential buildings for fire compliance.

- **App O Page 14 section on Water Supply missing the end of the sentence**.

- **Includes equestrian provisions that have been eliminated from project description**
  Page 14 of App O says a "full width cul-de-sac bulb will be constructed at the northern end of the access road to accommodate horse trailers ." and later "… will provide all weather access to the community equestrian areas and public water and sewer utility area." It is not clear that this is actually shown on Figure 2, but it clearly is not consistent with the rest of the project description that has waived all Equestrian Overlay District conditions.

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Cont.

- **Areas that require parking restrictions are not shown on Figure 2**
  Page 15 of App O talks about space for horse trailer parking, but this seems inconsistent with requirements for Fire Department turnaround. Also, the project description discussion of parking does not identify parking for visitors, deliveries, etc. Parking restricted areas should be identified on Figure 2. The project description needs to indicate the number and location of parking spaces provided, not just the 2 car garage for each residence.

- **Insufficient analysis and mitigation for failure to meet City of Oceanside Level 1 fire response time of 90% within 5 minutes**
  Page 19 and continuing describes the anticipated response times. Table 1 on page 20 shows expected response times for each of the three closest fire stations. On page 21 it says "The final decision regarding the need to mitigate for not strictly complying with the Oceanside Fire Departments time would be at Oceanside Fire Department Discretion." Per the CEQA process this is at the discretion of the City Council as the lead agency and should be done as part of the public process and not administratively, after the fact with no public awareness.

- **Failure to support adequacy of the proposed mitigation for violation of FMZ width**
  The proposed mitigation seems primarily the requirement for double paned windows on the homes along the "northern, western and eastern boundaries. Double paned windows are already required for all SFR's by the Building Code so this is not mitigation. And of course, windows only work to restrict embers entering the house if they are closed and there is no assurance that will occur 100% of the time during a fire situation. In other places it talks about the widening of Guajome Lake Rd., additional fire hydrants and limited number of new residents and vehicles as justification for the reduced width of FMZ's. There is nothing that justifies that these measures are sufficient to reduce this risk to an acceptable level. Furthermore, this has not been properly treated as a formal mitigation for project impacts. Without acceptable mitigation the project fails to meet fire safety standards for FMZs so whatever is proposed as mitigation needs to be specified as a formal project Mitigation Measure with accountability for construction and enforcement for the life of the project. Furthermore page 23 states FMZs are "arguably more important when situated adjacent to older structures." The FMZ width reduction does not just impact the project, it potentially impacts the other adjacent properties, which include older homes, and Guajome Regional Park. The DEIR has failed to consider any additional potential impacts to adjacent properties.

- **false conclusion that it is "not possible to achieve full 100' FMZ width"**
  This conclusion on page 39 is not accurate. Of course they could include the full width for the FMZs, but it would substantially reduce the developable area of the site.

- **Issues with Appendix D Prohibited Plants List**
  It appears that Appendix D is missing two species that have been specifically restricted from being planted in Oceanside— tamarisk and pampas grass. These (along with *Arundo donax* that is included) were restricted several years ago following a series of arson fires in the San Luis Rey River bed. There are also several native plant species that are present (or could become present) in the land that is set aside for preservation. This should clarify that such existing native plants in the preserve area are not restricted.

- **Failed to consider impacts of roadway plan on emergency evacuation**
  The DEIR concludes that because the project has two access driveways and that Guajome Lake Rd is being improved this will be sufficient for evacuation. However, these two driveways are within about 200 ' of each other and both access to the same road, Guajome Lake Rd. In addition, there are several roads in the project vicinity that also have a single road in and out- and that single road is Guajome Lake Rd. According to the Transportation analysis 50% of the project traffic will exit to the east and 50% to the west. During evacuations it is common for an evacuation route to be limited to a single direction, away from the fire and to avoid conflicts with responding emergency vehicles. This roadway condition with so many one way in and out roads could result in increased evacuation times. This is a particular concern in areas where animals may need to be evacuated as that also adds to the evacuation time.

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Cont.

We believe an evacuation time study should be done to ensure there can be safe evacuation considering these roadway design limitations and the need to evacuate animals. Also the county of San Diego has recently adopted standards for evacuation in areas with animals that should also be incorporated.

Parks

- **Incorrectly includes protected habitat as part of the recreational amenities**
  Page 4.13-1 says "residents of the project would have access to the 6.92 acres of common open space." That number of acres includes the protected on site natural habitat for which there is no recreational access identified. If recreational access is allowed into that habitat area, then this would result in additional impacts to biological resources that have not been evaluated.

Recreation

- **Inaccurate statement about parks maintained by the city**
  Page 4.14-1 says the city maintains a list of parks that include Calaveras Lake and Hosp Grove in Carlsbad, and Guajome Regional Park. The city of Oceanside does not maintain these three parks.

- **The analysis concludes that the park standard of 5 acres/1,000 residents will be met by the future El Corazon park**
  There are no assurances as to when, if ever, the park acres included on ELC will ever be built. The first of 9 proposed parks on ELC was recently delayed for an unknown period of time when cost estimates more than doubled and there are insufficient funds available for construction. No funds have been committed to any of the other future parks on ELC. The city does not have a valid plan to address the existing shortfall in park acres and this project will further exacerbate that shortfall.

- **There is no discussion of the impacts of the project on the recreational value of Guajome Regional Park**
  The park is described as 75 acres with 4.5 miles of trails, diverse habitat, playgrounds, basketball court and 33 campsites. The DEIR says that 420 feet of Guajome Lake Rd will be widened and improved within the park. There is no analysis of the direct impacts of this road widening although there is a parallel trail within the park that will now be closer to an improved road with increased traffic. The project would impact views from the trails and other areas of the park, and add noise and air pollution. There is no discussion about how eliminating compliance with the EOD for this project right along the park could impact equestrian access to the park, including from several horse properties on the north side of

O3a-1
Cont.

Guajome Lake Rd who will now need to cross this wider road with heavier traffic to access the trails within the park.

Population/Housing

- **Table 6-1 fails to identify numerous projects using density bonus to exceed the allowed density in the General Plan**
  There are a large number of projects already approved or in the pipeline that have used the density bonus law to exceed the number of housing units that are allowed in the General Plan. Furthermore, every discussion of housing in the DEIR uses the gross RHNA number for the current 8 year housing cycle and fails to show details by income level, and actual progress toward achieving those goals. A key impact is that overbuilding of above moderate housing has a disproportionate impact as these units are larger, have more vehicles and create more GHG. Attachment C to this comment letter shows the most recent SANDAG dashboard of housing for the city of Oceanside. At this rate the city is on track to exceed the above moderate housing units in a few years as it has already achieved 42.5 % in the first two years of the eight year cycle. At that pace it will achieve 180% of the total in the eight-year cycle. Oceanside, like most cities in this region, still fails to meet the need for very low income and low- income housing while continuing to build more above moderate units than are needed.

Other CEQA Considerations

O3a-1 Cont.

- **Project is growth-inducing**
  Once a non-equestrian project is allowed in this low density equestrian area it will start the dominoes falling—with more such projects to follow. The special overlay districts for the park and equestrian use were approved in 1992. It is clear from the slow rate of change in this area that they have helped protect its unique character. This developer is already under contract to purchase another nearby property (See Att D) . One can anticipate he will follow the same model he used with this project resulting in more pressure to develop this area with high density housing.

Improving at least part of Guajome Lake Rd and extending the sewer system will make it that much easier for the next project to increase the density and change the character of this area. These cumulative impacts all have long term cost implications for the taxpayers of Oceanside and continued adverse impacts on this neighborhood and are growth inducing.

Alternatives Analysis

We very much appreciate that the DEIR has identified an environmentally superior alternative that is both feasible and actually substantially reduces the adverse impacts of the proposed project. But further analysis of impacts and mitigation is needed because of the changes proposed with this alternative. It is proposing similar waivers as the existing project— which results in substantial potential impacts as discussed in these comments.

The change in land use to multi-family residential will require a General Plan Amendment and numerous other changes. That change in land use would require VMT analysis because the project will produce over 500 ADT. It does not appear that this analysis has been done for this alternative. Also the ECAE Policy 21-2 says the City shall explore incentives for EV charging facilities in multi-family developments. CAP compliance would need to be re-evaluated.

Thank you for considering our comments.

Sincerely,

Diane Nygaard, President
On Behalf of Preserve Calavera

Attachments:
A MHCP/C SAP Edge Effect Conditions
B Chatten Brown Carstens Letter on Failure to Implement the CAP
C San Diego County RHNA Dashboard for Oceanside
D Description of Nearby Property Under Contract for Purchase
E HCD letter Allowing Justification For Use of Waivers

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Cont.

Attachment A: MHCP/C SAP Edge Effect Conditions

City of Oceanside – Standard Project Conditions

SELECT AS APPROPRIATE - FOR PROJECTS LOCATED ADJACENT TO RESERVE AREAS OR WITH OTHERWISE SENSITIVE HABITAT ISSUES

1. A qualified biologist shall be retained by the applicant to review the final grading plans, access routes and staging areas, monitor all aspects of construction, educate contractors about the biological sensitivities associated with the area and ensure compliance with mitigation measures.
2. The qualified biologist shall conduct a training session for all project personnel prior to any grading/construction activities. At a minimum the training shall include a description of the target species of concern, its habitats, the general provisions of the Endangered Species Act (Act) and the MHCP, the need to adhere to the provision of the Act and the MHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the target species of concern as they relate to the project, any provisions for wildlife movement, and the access routes to and project site boundaries within which the project activities must be accomplished.
3. A water pollution and erosion control plan shall be developed that describes sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices and other factors as deemed necessary. Erosion control measures shall be monitored on a regularly scheduled basis, particularly during time or rainfall. Corrective measures shall be implemented in the event erosion control strategies are inadequate. Sediment/erosion control measures shall be continued at the project site until such time as the revegetation efforts are successful at soil stabilization.
4. The footprint of habitat disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
5. The upstream and downstream limits of project disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.
6. Placement of equipment and personnel within environmentally sensitive habitat areas stream channels or on sand and gravel bars, banks and adjacent upland habitats used by target species of concern shall be avoided. Activities that can not be conducted without

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placing equipment or personnel in sensitive habitats shall be timed to avoid the breeding season of the target species of concern.

7. When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing or other sediment trapping materials shall be installed at the downstream end of the construction activity to minimize the transport of sediments off-site. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from re-entering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.

8. Equipment storage, fueling and staging areas shall be located to minimize risks of direct drainage into riparian areas or other environmentally sensitive habitats. These designated areas shall be located in such a manner as to prevent runoff from entering sensitive habitats. All necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. All project related spills of hazardous materials shall be reported to appropriate entities including but not limited to the City of Oceanside, FWS, and CDFG, SWQCB and shall be cleaned up immediately and contaminated sails removed to approved disposal areas.

9. Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.

10. Stockpiling of materials and other aspects of construction staging shall be limited to disturbed areas without native vegetation, areas to be impacted by project development or in non sensitive habitats.

11. "No-fueling zones" shall be established within a minimum of 10 meters (33 feet) from all drainages and fire sensitive areas.

12. Scheduling of construction activities shall minimize potential impacts to biological resources. Construction adjacent to drainages shall occur during periods of minimum flow (i.e. summer through first rain of fall) to avoid excessive sedimentation and erosion and to avoid impacts to drainage dependent species. Construction near riparian

O3a-1
Cont.

areas or other sensitive habitats shall be scheduled to avoid the breeding season (March through September) and potential impacts to breeding bird species.

13. Construction activities during the breeding season (dates tbd depending upon species of concern- some start in Feb March through September) shall be limited to those that will not produce significant noise impacts (i.e. noise levels greater than 60 dBLeq –decibels equivalent sound level) at the edge of the habitat of concern.

14. Conduct preconstruction surveys at potential impact areas between mid-May and mid-June.

15. Human and pet access to preserve areas shall be limited to designated trails by use of natural vegetation, topography, signs and limited fencing.

16. Artificial lighting adjacent to the preserve area shall be eliminated except where essential for roadway, facility use and safety and security purposes. Where use of artificial lighting is necessary it shall be limited to low-pressure sodium sources. Use of low voltage outdoor or trail lighting, spotlights or bug lights is prohibited. All light sources shall be shielded so that lighting is focused downward to restrict any light spillover onto sensitive habitat.

17. The HOA shall establish an education program for homeowners regarding responsible pet ownership. The program shall encourage a) keeping pets indoors, especially at night; b)having pets neutered or spayed to reduce unwanted reproduction and long-range wandering; c)belling of cats to reduce their effectiveness as predators; d) prohibiting release of unwanted pets into the wild; e) keeping dogs on leashes when walking them on trails in preserve areas.

18. The HOA shall establish a feral animal removal program.

19. The qualified biologist shall monitor construction activities throughout the duration of the project to ensure that all practicable measures are being employed to avoid incidental disturbance of habitat and any target species of concern outside the project footprint. Construction monitoring reports shall be completed and provided to the City of Oceanside, FWS and CDFG summarizing how the project is in compliance with applicable conditions. The project biologist shall be empowered to halt work activity if

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Cont.

necessary and to confer with staff from the City of Oceanside, FWS and CDFG to ensure the proper implementation of species and habitat protection measures.

20. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species. Al revegetation plans shall be prepared and implemented consistent with Appendix C (Revegetation Guidelines of the Final MHCP Plan – Volume II) and shall require written concurrence of the FWS and CDFG.

21. To avoid attracting predators of the target species of concern, the project site shall be kept clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site. Pets of project personnel shall not be allowed on site where they may come in contact with any listed species.

22. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits shall be fenced with orange snow screen. Exclusion fencing shall be maintained until the completion the completion of all construction activities. All employees shall be instructed that their activities are restricted to the construction areas.

23. Any habitat destroyed that is not in the identified project footprint shall be disclosed immediately to the City of Oceanside, FWS and CDFG and shall be compensated at a minimum ratio of 5:1.

24. If dead or injured listed species are located, initial notification must be made within three working days, in writing to the Service's Division of Law Enforcement in Torrance California and by telephone and in writing to the applicable jurisdiction, Carlsbad Field Office of the FWS, and CDFG.

25. The City of Oceanside shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project conditions and BMPs. The FWS and CDFG may accompany the City representatives on this inspection.

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Cont.

26. Any planting stock to be brought onto the site for landscaping or ecological restoration shall be first inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants, fire ants, and other insect pests. Any planting sock found to be infested with such pests shall not be allowed on the project site or within 300 ft of natural habitats. The stock shall be quarantined, treated or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats.

27. New utility lines or towers or modification of existing utility lines or towers shall implement designs that preclude or minimize harm to wildlife due to collisions or electrocution. Information on such designs is available at www.migratorybirds.fws.gov/issues/towers.

28. Use bridges, instead of culverts for all major riparian crossings and regional wildlife movement corridors. The site of the riparian crossing and its importance as a wildlife corridor should dictate the design. (Where appropriate based on site specific survey results) Wildlife undercrossings shall be designed and implemented (for new roads or road improvement projects that could disrupt wildlife movements or result in increased road kill). Such undercrossings, along with any necessary wildlife fencing or other facilities, shall be designed based on best available information to maximize use of the undercrossing by species of concern. Undercrossing design shall strive to maximize the openness index (widthXheight/length), minimize traffic noise within the crossing, use skylight openings within the underpass to allow for vegetative cover within the underpass, use appropriate fencing to funnel wildlife into the crossing rather than across the road surface, and screen the undercrossing opening and access path with natural vegetation. Undercrossing design shall be subject to review and approval by the City of Oceanside, FWS and CDFG prior to issuance of grading permits.

29. All mitigation sites shall be conserved through fee title acquisition or conservation easement, and proof of recordation shall be provided to the City of Oceanside prior to land disturbance.

30. Use of retaining walls shall be minimized. Development on the site shall be configured to existing topography to minimize grading and landform alteration.

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Cont.

31. Existing natural drainages and watersheds shall be maintained. The project shall restore or minimize changes to natural hydrological processes.

32. Detention basins shall incorporate earthen berms to allow growth of natural vegetation.

Note : There are additional specific conditions in areas of equestrian use

CONDITIONS SPECIFIC TO BUENA VISTA LAGOON

33. The Buena Vista Lagoon boundary (and/or wetland area) shall be delineated and criteria used to identify any wetlands existing on site shall be those of Section 30121 of the Coastal Act. Mapping of wetlands, conditions to protect sensitive resources and siting of development shall be done in consultation and subject to approval of DFG.

34. Landscaping on the site shall be utilized as a visual buffer and shall be compatible with the surrounding native vegetation and preserved open space through installation of native, non-invasive, drought tolerant plant species.

35. Approved landscaping shall be installed immediately upon completion of construction and maintained by the property owner in good growing condition for the life of the development.

36. Landscaping screening of structures with specimen trees and fire-retardant vegetation of substantial height, shall be required to screen and soften the view of structures from _____(Interstate 5/ Buena Vista Lagoon etc.) and public vista points.

37. A HOA shall implement a landscape management plan that includes herbicide/pesticide management and removal of invasive species..

38. On-site sensitive biological resources areas inclusive of the 100-ft buffer area shall be left in their natural state (or restored with native drought tolerant vegetation) and used only for those passive activities allowed as a condition of permit approval. The permissible passive activities and any other conditions of the permit shall be incorporated into a covenant of easement that shall be recorded against title to the property. The USFWS and DFG shall be named beneficiaries to any covenant of easement recorded pursuant to this condition.

39. The use of chemical pesticides for mosquito control is prohibited (rely on biological agents).

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Cont.

40. Access to buffer and sensitive habitat areas is prohibited during the breeding season (see species specific guidelines for breeding season dates) except for emergency access.

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Cont.

Attachment B: Chatten Brown Carstens Letter on Failure to Implement the CAP

Chatten-Brown Law Group, APC
Kathryn Pettit | Associate
325 W. Washington Street, Suite 2193
San Diego, CA 92103
kmp@chattenbrownlawgroup.com
Phone: (619) 393-1440

December 22, 2023

Via email

City of Oceanside City Manager
Jonathan Borrego

Re: The City of Oceanside's Failure to Implement its Climate Action Plan and Necessary Remedial Actions

Dear Mr. Borrego:

Our firm represents Preserve Calavera in relation to the City of Oceanside's Climate Action Plan. The mission of Preserve Calavera is to protect, enhance, and restore the natural resources of Coastal North San Diego County, which includes addressing and minimizing the growing impacts of climate change. As the world's leading experts on climate change have underscored:

> Climate change is a primary driver of biodiversity loss. And climate change depends on biodiversity as part of the solution. So clearly, the two are linked and cannot be separated.

(Elizabeth Mrema, Executive Secretary, United Nations Convention on Biological Diversity, May 2022.)[1]

As the harmful and costly impacts from climate change increase, swift and meaningful climate action from local governments becomes more and more imperative.[2] Yet, the City of Oceanside ("City") is failing to achieve several specified measures, strategies, and targets that are required under its Climate Action Plan ("CAP"). It is further failing to comply with the CAP's implementation and monitoring requirements.

At the outset, Preserve Calavera would like to make clear that its paramount goal is successful implementation of the CAP, and to achieve further reductions in greenhouse gas ("GHG") emissions in the City to ensure alliance with the State's climate mandates. At this stage, the purpose of this letter is not to initiate litigation, but to spur collaboration. Preserve Calavera aims to underscore the gravity of the CAP's shortcomings, propose solutions, and begin a cooperative process moving forward.

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[1] https://www.un.org/en/climatechange/science/climate-issues/biodiversity
[2] https://www.nature.com/articles/d41586-023-03849-y [Climate change has placed the world in danger of breaching numerous planetary 'tipping points']; https://www.noaa.gov/news-release/climate-change-impacts-are-increasing-for-americans [Climate change impacts are increasing for Americans];

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Cont.

Preserve Calavera is committed to help reduce GHG emissions in Oceanside, and has secured funding to support local GHG-reducing projects. Preserve Calavera seeks to work together with the City to ensure timely and urgent implementation of the CAP, as well as additional local GHG reduction projects, to which Preserve Calavera can contribute funding.

I. Overview

Preserve Calavera urges the City to implement and adhere to its CAP. Unfortunately, as described throughout this letter, the City is falling woefully short of its promised strategies, timelines, monitoring, and implementation actions.

The City's own staff alerted City Council to several of these failures last year, including the lack of adequate staffing and funding. Yet, the City failed to take any meaningful action. Preserve Calavera has also notified the City of its failures to implement the CAP on several occasions. Meanwhile, the City continues to take advantage of the CAP's streamlining benefits and approve projects without individual-level GHG analysis and mitigation. We detail several examples of the City's failure to implement its CAP in **Section II**.

These failures result in ongoing violations of CEQA. First, the CAP is both an element of the City's General Plan and a mitigation measure for all development under the General Plan. Thus, it must be implemented and enforced, as detailed in **Section III**.

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Additionally, the City continues to rely on the CAP as a GHG streamlining plan. CEQA Guidelines Section 15183.5 establishes the criteria for "Tiering and Streamlining the Analysis of Greenhouse Gas Emissions." The CAP fails to meet these criteria, and cannot be relied on for GHG analysis and mitigation for individual project CEQA review until the City's deficient implementation is corrected, as detailed in **Section IV**.

Finally, we see that the City is in the process of updating its General Plan, which may include an update to its CAP. The City must promptly update the CAP to remedy the deficiencies identified throughout this letter, especially in light of the history of inadequate and incomplete implementation. Preserve Calavera provides several recommendations in **Section V**.

Preserve Calavera appreciates the staff members who have worked on the CAP and its implementation. However, the City has failed to supply the funding, resources, time, and personnel to implement and monitor the CAP. This must change.

II. The City Is Failing to Implement its CAP

The City is failing to meet several of the CAP's specified strategies, timelines, and targets, as well as its required monitoring, reporting and adaptive management standards. Climate Action Campaign gave Oceanside a score of 53.5/100 for the City's CAP implementation.[3] Further, the City's 2022 Climate Action Plan Implementation Progress Report ("Progress Report") demonstrated concerning deficiencies in the City's progress with CAP implementation, and revealed there is little monitoring being conducted.

a. Failure to Implement the CAP's Overarching Requirements, Including to Conduct Monitoring and Update the GHG Inventory

The CAP requires annual monitoring and reporting to track implementation progress and update the City's GHG inventory and forecasts. The CAP explicitly states: "The City will be responsible for developing protocol for monitoring the effectiveness of emissions reduction programs as well as for undertaking emissions inventory updates." (CAP, p. 4-22, see also "City will keep track of reduction measures implemented and schedule milestones identified in the CAP, including progress reports on the reduction measures, funding, and savings.")

As an initial matter, the City did not even publish its first required "annual" report until August 2022, despite approving the CAP three years earlier in August 2019. (Ibid. ["the City will report annually to the City Council on CAP implementation progress, activity indicators, and relevant changes in State measures"].)

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Further, the 2022 Progress Report admitted that "the City has not consistently reported CAP progress." It attributed this lack of consistent reporting to "staffing challenges," yet said little about how the City plans to correct itself besides its vague assertion that "steps are being taken to develop a more consistent reporting system." (Progress Report, **Exhibit A**, p. 1.) We were unable to locate a 2023 Annual Progress Report.

Relatedly, the CAP had proposed an interdisciplinary Climate Action Planning Team and anticipated the establishment of a CAP Stakeholder Committee. (CAP, p. 4-1.) Yet, the City has only hired a "part time professional assistant" to coordinate CAP implementation." (Progress Report, p. 2.) The Progress Report admitted, "staff finds that additional staffing and/or funding resources **are needed** to effectively implement, monitor, and report on several of the emissions reduction measures. It is recommended that the City consider funding for a full-time

[3] 2022 Climate Action Plan Report Card, p. 10 (available at: https://www.climateactioncampaign.org/_files/ugd/91c4c2_db55421e0abd475aa467110ede7c298e.pdf?index=true)

sustainability coordinator…" (p. 12.) Further, "staff in responsible departments **indicated a lack of capacity for CAP implementation**." (Id. at p. 3, emphasis added.)

In March 2020, members of the public raised concerns to the City that it was not devoting enough resources to CAP implementation, and that it needed to ensure adequate staffing.[4] These concerns went ignored.

The 2022 Progress Report still failed to provide direction or concrete steps to address the deficiencies raised in the Progress Report, especially in regard to the current lack of adequate staffing, funding, and monitoring. In contrast, the cities of San Diego, Chula Vista, Carlsbad, Encinitas, and Del Mar maintain full-time staff dedicated to CAP implementation.

These overarching failures indicate a lack of priority to CAP implementation and erode confidence that the CAP is meeting its promised targets and GHG reductions.

Finally, the CAP states: "The City will comprehensively update its 2020 GHG inventory to evaluate progress toward meeting its GHG reduction goals . . . **Moving beyond 2020**, the City will comprehensively update its GHG inventory **every five years**." (p. 4-22, emphasis added.) Yet, the Progress Report simply states, "An updated inventory will be prepared in conjunction with the next CAP update." (p. 16.)

The City was required to prepare an updated inventory in 2020, and then again in 2025. Thus, it is imperative that the City prepares an updated inventory promptly. The City cannot wait multiple years to conduct this analysis – this must be initiated now, and completed as soon as possible.

O3a-1
Cont.

We request a response from the City about when it plans to publish the next progress report, when it plans to update the GHG inventory, and what remedial actions it has taken since the 2022 Progress Report to address the deficiencies identified therein.

b. Failure to Implement the CAP's Specific Measures

We also documented several specific examples of the City's failures to implement measures that were identified in the CAP. Of the CAP's strategies, the majority have seen little to no progress since CAP adoption. In **Exhibit B**, we highlighted in red all strategies that have not completed the required actions by the CAP's specified deadlines, have seen no substantive progress, and/or

[4] Summary of Public Comment Received at Open House, March 3, 2020 (available at: https://records.ci.oceanside.ca.us/civicax/filebank/blobdload.aspx?blobid=53000.)

are now considered infeasible. We highlighted in orange all strategies that fail to provide additional GHG reductions.[5]

A review of the individual strategies that were promised in the CAP, and what has been accomplished to date, is disconcerting. Only a fraction of the CAP has actually been implemented, and the City has failed to meet several timelines and targets. We detail some of these shortcomings in depth below.

i. Renewable Energy Procurement

The CAP assigned its highest reduction potential – 73,685 MT CO2E by 2030 – to Renewable Energy Procurement (Measure E-1). (CAP, p. 4-7.) In fact, this measure accounts for **over 48%** of the CAP reductions.

The Progress Report claims this measure is "Mostly Implemented." (p. 23.) Yet, a review of the individual strategies indicates otherwise. One of the CAP's four strategies to implement Measure-E1 requires the City to "Promote Participation in SDG&E EcoChoice and Ecoshare Programs." The Progress Report claims this strategy is "In Progress." Yet, the Progress Report later admits that "SDG&E is **discontinuing** EcoChoice and EcoShare has presented **extensive barriers** to entry for prospective subscribers." The other strategy also centered on receiving reports on SDG&E Procurement and Program Participation, which is also claimed as "In Progress." Thus, these strategies are failing.

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Cont.

While we are encouraged by the City's direction to join the Clean Energy Alliance, in line with the third strategy, the City has not provided any evidence or data to show the CAP will achieve the promised reductions for Measure E-1.

Thus, we request the City demonstrate that it is meeting the CAP's target for Measure E-1 to "procure 75 percent of local energy from renewable sources by 2030 and thereby exceed California RPS mandates." (CAP, p. 3-3.)

ii. Solar Photovoltaic Promotion Program

The CAP's second highest anticipated GHG reductions reportedly come from its Solar Photovoltaic Promotion Program (Measure E-2), which the Progress Report claims is "Mostly Implemented." Measure E-2 lists four strategies for its implementation, but only half have been completed.

[5] Meaning, the strategies do not cause GHG reductions that would have not otherwise occurred without the CAP.

The Progress Report claimed two of these strategies are "In Progress." Yet, very little progress has occurred for both. For the "Promote Solar Financing Options" Strategy, the Progress Report simply states, "The City has outreach content in development." For the "Establish an Aggregated Demand Solar PV Program" strategy, the City is only "in the process of gauging interest," and exploring the "potential legal implications of partnering with private industry on such a program." (Progress Report, p. 26.) Both of these strategies not only failed to meet the CAP's prescribed timelines, but they are far behind meeting the CAP's timelines. (CAP, p. 4-10.)

While the City adopted a solar ordinance in 2019, much of its mandates are already required by the State Building Code. The CAP notes, in a footnote, "the Energy Code will require that new residential projects incorporate renewable energy beginning January 1, 2020. The residential-component of the Ordinance will achieve GHG emission reductions by enforcing renewable energy requirements beginning at an earlier date." Yet, the ordinance was only adopted a few months earlier. Similarly, the final strategy only requires the City to "maintain" expedited permitting for Residential Solar PV Systems. Thus, these two strategies provide very little additionality.

Further, the City has not provided any monitoring data demonstrating it is meeting the CAP's reduction target of 50 percent forecasted energy demand. (CAP, p. 4-9). The only energy efficiency data provided in the 2022 Progress Report is a snapshot from 2018. There appears to be no monitoring or reporting beyond the adoption of the ordinance. This is a common theme across the board, and conflicts with CAP standards for monitoring implementation of reduction measures. (See CAP, p. 4-22.)

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Cont.

Thus, out of the four strategies, two have seen no progress, one requires nothing additional of the City, and the final strategy has not been monitored at all.

iii. Energy Promotion Measures

The CAP Measures E-3, E-4, and E-5 all centered on "promotion" of voluntary programs to City residents, which demands very little financial resources of the City. Yet, the City has not made progress on these measures.

Residential Energy Conservation and Disclosure (Measure E-3) included two strategies. For Strategy #1, "Promote Residential Energy Use Disclosure," the Progress Report states the "[t]he City is awaiting information from SDG&E *on the future of* the Home Energy Use Benchmarking Program." For Strategy #2, "Promote Energy Efficiency Improvement Financing Options," the Progress Report stated that "*Upon development of a program*, information, or resources by Development Services, the Water Utilities Green Oceanside program *will promote* through their outreach and education campaigns."

Thus, both of these strategies have seen no progress, and both fall behind the CAP's timelines and targets. (CAP, p. 4-10.)

For "Promotion of Low-Income Financing Programs" (Measure E-4), there was only one strategy: "Promote Low-Income Financing Options." The Status Report states this is "In Progress," but a closer look reveals this strategy has little chance of being implemented. The Progress Report states that "[t]he City began researching programs such as the California Solar Initiative. SASH, MASH, and LIWP. All programs previously outlined in the CAP have either sunset, run out of funding, or doesn't [sic] apply to Oceanside as the City is not considered a Disadvantaged Community." (Progress Report, p. 21.)

For "Non-Residential Building Energy Benchmarking and Disclosure" (Measure E-5), there was only one strategy, "Promote Non-Residential Energy Use Disclosure," which also has not been started. "The City **will begin** the planning process and meet with relevant staff to develop an outreach plan." (Progress Report, p. 21.)

iv. Transportation Measures

Transportation emissions account for 48% of Oceanside's GHG inventory. The CAP included a measure for Transportation Demand Management ("TDM") Plans (Measure TL-5), premised on three strategies. The CAP required adoption of a TDM ordinance as Strategy #1, which the City adopted in 2020.

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Cont.

While the ordinance is a step in the right direction, if it is not enforced and monitored, its adoption is ultimately meaningless. When Preserve Calavera submitted a Public Records Act request earlier this year for copies of TDMs and related monitoring reports, the City only produced one TDM plan from 2021. Further, the City did not produce any monitoring reports – just this one initial TDM plan. (**Exhibit C**, City Response to Preserve Calavera PRA Request.) This indicates a lack of monitoring and enforcement of the ordinance, and undermines the CAP's claimed "moderate" GHG reductions for this measure. The CAP's projected GHG reductions relied on an assumed 10% milage reduction in commuter trip miles through this ordinance. Yet, the TDM ordinance itself, as well as the lackluster implementation and monitoring, fail to demonstrate anything close to a 10% trip mile reduction.

Further, the City has failed to implement the CAP's remaining TDM strategies. Strategy #2 required the following: "Conduct surveys of business to determine existing TDM measure implementation rates. Require businesses complete survey during business license renewal. Provide rebates for implementation of TDM measures such as addition of bicycle parking or transit stop shelter improvements." (CAP p. 3-32.)

The City was supposed to complete these requirements by now. (CAP, p. 4-16.) In particular, the CAP required the City to develop the survey within a year of CAP adoption, and then administer the survey to 25% of existing businesses within one year, and to 100% of businesses within 4 years of CAP adoption. (CAP, p. 4-16). Yet, according to the 2022 Progress Report, "The City is in the process of **generating** the content of a TDM survey and will aim to disperse the materials to the business community in September of 2022." (Progress Report, p. 28, emphasis added.) The Progress Report is silent on the other elements.

Finally, the Progress Report admits it lacks funding to complete the third strategy to "[p]rovide incentives and marketing promotion through Green Oceanside Business Network for businesses that incorporate TDM measures." (Progress Report, p. 28.) In contrast, the CAP promised that the City would "Use Survey Results to Identify TDM Opportunities Within 18 months of CAP Adoption," and then "Provide Incentives as Appropriate for Infrastructure Improvements to Support Alternative Modes of Transit Within 2 years of CAP Adoption." Four years have passed since CAP adoption.

The City must dedicate resources and fundings to its CAP measures. It cannot raise its hands in the air for lack of funding, while failing to provide any solutions. At a minimum, if it cannot identify funding to implement its CAP, it must then cease to utilize the CAP for CEQA streamlining.

v. Electric Vehicle Promotion

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The CAP reported moderate reduction potential for "Electric Vehicle Promotion" (Measure TL-2), which was reported as "Mostly Implemented." One of the strategies requires the City to "collaborate with local EV retailers to establish an Aggregated Demand EV Program." (CAP, p. 3-5.) According to the 2022 Progress Report, this measure is "in progress and facing obstacles," and is ultimately considered infeasible "due to the current lack of availability in the EV market." (Progress Report, p. 25.)

Another strategy, "Promote Incentives for EVs and EV Charging Stations" was reported as "In Progress," on the grounds that "The City provides expedited permitting for EV charging stations through our Checklist For Permitting Electric Vehicles and Electric Vehicle Service Equipment." (Progress Report, p. 25.) Yet, in contrast, the CAP had required a host of actions for promotion beyond a Permit Checklist that were omitted from the Progress Report:[6]

[6] Similarly, the Progress Report omits strategies for Measure TL-4, including to "Require new developments to provide connections and/or extensions of the bicycle and pedestrian networks where applicable." (CAP, p. 3-30.)

- Promote incentives for purchase of ZEVs such as available federal tax credits (up to $7,500) and available rebates offered through the California Clean Vehicle Rebate Project (up to $2,500).
- Provide permit fee waivers for construction related solely to the installation of EV charging station circuitry such as electrical rewire permitting, electrical service upgrade permitting, or other miscellaneous permitting that is typically charged at an hourly rate.
- Allow by-right sale of ZEV vehicles within all retail-oriented commercial zones.
- Incentivize installation of direct current fast charging stations at gas stations and other retail.
- Establish public-private partnerships to increase charging infrastructure at existing office and industrial facilities.
- Promote commercial businesses and industry that provides EV charging stations and incentives for EV use to employees through added marketing and benefits from City's Green Oceanside Business Network program.

(CAP, p. 3-27 to 3-28.)

Further, the CAP required several of these actions to be accomplished by now. (CAP, p. 4-14.) Beside adoption of Zoning Ordinance 3048 in 2020, the City has not made any progress on Measure TL-2, and has failed to meet the majority of deadlines and timelines specified in the CAP.

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vi. Water, Wastewater, and Solid Waste Measures

The City has also failed to implement the CAP's additional measures related to waste and wastewater. Of the CAP's three measures, the first measure simply requires the City to continue to "Implement its Water Conservation Master Plan" (Measure W-1), which predated the CAP. Thus, this measure does not provide any additional GHG reductions. Nor does the Progress Report provide any monitoring data.

The second measure, "Non-Residential Water Use Benchmarking and Disclosure" (Measure W-2), only requires one strategy – "Promote Non-Residential Water Use Disclosure." Yet, the Progress Report admits the City has not even started any promotion, as "The City is researching what programs are available…" (Progress Report, p. 22.)

Finally, the third measure, "Increased Local Water Supply" (Measure W-3) is "In progress and facing obstacles" and "needs to be updated." (Progress Report, p. 22.) In contrast, the CAP had promised the following strategy: "Identify and implement capital improvements to the San Luis Rey Water Reclamation Facility that increase the supply capacity of recycled water that meets Title 22 requirements for unrestricted use to at least 3.0 million gallons per day by 2025; 5.5

million gallons per day by 2035, and 7.5 million gallons by 2045." (p. 3-16.) Notably, Measure W-3 anticipated 2,102 MT in reductions by 2025.

To address solid waste emissions, the CAP established two measures. The first measure was "Implementation of Zero Waste Strategic Resource Plan" (Measure SW-1), which the City had enacted in 2012. Again, this measure fails to require any new actions from the City, and thus fails to provide additional GHG reductions.

The second measure, "Beyond 2020 – Enhanced Waste Diversion" (Measure SW-2), included a host of strategies to enhance waste diversion. Notably, the CAP required, "In 2020, the City will …draft an update to the Zero Waste Resources Management Plan that will reset targets to ensure a **minimum 90 percent** diversion rate in the near future." (p. 23, emphasis.) The Progress Report provided little information on implementation of this measure, and omitted the new minimum 90% target rate that was supposed to be enacted three years ago.

Thus, the City has failed to implement these measures.

vii. Agricultural & Forestry Measures

The CAP included four measures in the realm of agricultural and forestry. None have reported any success.

Under the Urban Forestry Program (Measure AF-1), the CAP established a target to plant 200 trees each year on public rights-of-way and to require development projects to incorporate an annual average of 200 additional trees per year. (CAP, p. 3-35.) This measure involved eight strategies, of which only two have been completed (complete tree inventory, and adopt a Green Streets Ordinance.) Further, the CAP set a target requirement of 35% tree cover for new development, yet the City's proposed ordinance only requires 7-12% tree cover. (CAP, p. 4-16; Progress Report, p. 35.)

For "Urban Agriculture and Community Gardens" (Measure AF-2), half of the four strategies are reported as "Not Yet Initiated," and the other half are reportedly "infeasible." (Progress Report, p. 31.) Further, the Progress Report again omitted several of the CAP's strategies, including to "Establish a population ratio goal for community gardens within the City," "Create and implement a Community Garden Program," "Amend zoning regulations to allow for urban agriculture and community gardens in appropriate zones," and "Provide incentives to multi-family developments that include community gardens for residents." (CAP, p. 3-37.)

The CAP also included a measure for "Agricultural Lands Conservation" (Measure AF-3), in response to the development pressure in agricultural areas of South Morro Hills, and required the following strategy: "Collaborate with landowners to prepare agricultural easement grant

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applications to the SALC Program. Between 2020 and 2024, identify internal or external funding sources for minimum matching funds for up to **250 acres of agricultural preservation easements**. Between 2025 and 2029, identify internal or external funding sources for minimum matching funds for up to 250 acres of agricultural preservation easements." (p. 3-39.)

According to the Staff Report, the City has not preserved any acres yet, despite 2024 being less than one month away. Instead, the City has taken actions that actively undermine this goal, including approval of projects that result in significant loss of agricultural lands to development in South Morro Hills.

The Progress Report states, "The City has initiated dialogue with representatives of the SALC program and San Diego County's PACE program" and "will look for opportunities to promote these programs." (p. 31.) Again, the City has completely fallen short of the CAP's promises.

III. The City Is Legally Required to Implement Its CAP under CEQA

The City's September 28, 2022 CAP Implementation Report states, "The CAP is supported by the Environmental Impact Report (EIR) prepared for the first phase of the GPU, and as such, is considered a legally enforceable document."

The CAP is a binding, enforceable document. Further, the Energy Climate Element of the City's General Plan states:

> In accordance with CEQA, the City's decision to initiate a General Plan Update (GPU) has prompted the need to prepare and implement a CAP… which outlines a variety of measures **designed to mitigate the anticipated GHG emissions impacts of future development** and reduce local GHG emissions in accordance with state goals.

(Energy Climate Element, p. 3-8, emphasis added.)

The CAP is thus incorporated as a mitigation measure for the City's General Plan Update. The General Plan further includes the CAP as an appendix. The City's General Plan explains: "As the City pursues subsequent phases of the GPU, its CEQA-qualified CAP will help to ensure consistency with the state's climate action goals and policies while streamlining the local development review process." (Energy Climate Element, p. 4-7.) Further, "The City's CAP summarizes the emission sources and provides measures the City **will take** to achieve the State's 2020 and 2030 per capita GHG reduction targets." (*Id.* at p. 6-1, emphasis added.)

The City incorporated its CAP into its General Plan to mitigate GHG emissions from General Plan development. Thus, the CAP is enforceable under CEQA as a promised mitigation measure.

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An agency must implement promised mitigation measures, and where it fails to do so the public may enforce the mitigation measure under CEQA. (*Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1166.) "Mitigating conditions are not mere expressions of hope." (*Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508). Mitigation measures must be fully enforceable to ensure that they "will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." Further, the City must adhere to its General Plan. (*Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540.)

Thus, the City is legally obligated to implement its CAP.

IV. The City Cannot Use a CAP It Is Not Implementing for CEQA Streamlining

CEQA Guidelines Section 15183.5 establishes the required criteria for tiering and streamlining the analysis of GHG emissions. Of particular relevance, Section 15183.5 instructs that qualified plans should:

> (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
> (C) Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
> (D) Specify measures or a group of measures, including performance standards, **that substantial evidence demonstrates,** if implemented on a project-by-project basis, **would collectively achieve the specified emissions level**; and
> (E) Establish a mechanism to monitor the plan's progress toward achieving the level **and to require amendment** if the plan is not achieving specified levels.

(Section 15183.5, subd. (b)(1)(B)-(E), emphasis added.)

The Natural Resources Agency adopted CEQA Guidelines Section 15183.5 to address concerns that agencies preparing CAPs might "erroneously rely on a plan with purely aspirational intent to determine that a later project's cumulative impact is less than significant pursuant to section 15064(h)(3)." (**Exhibit D** [Natural Resources Agency Final Statement of Reasons for Amendments to CEQA Guidelines]). The Natural Resources Agency noted the criteria in Section 15183.5(b)(1) are intended to ensure CAPs avoid or substantially lessen a cumulative problem as required by Section 15064(h)(3), stating "Criteria (D) and (E) **are necessary** to demonstrate that the plan **will actually avoid or substantially lessen** the cumulative effects of those emissions."

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Substantial evidence does not demonstrate that the City's CAP is achieving – or will achieve – the specific emissions reductions, in contravention of the Section 15183.5 criteria and section 15064(h)(3).

The State has elaborated on the importance of implementation of emission reduction measures, explaining: "The heart of a CAP is the suite of reduction measures that will ensure that the plan achieves the selected reduction targets in a transparent and replicable manner."[7] Yet, the City is failing to implement the majority of the CAP's reduction measures.

Further, *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal. App. 4th 70, provides guidance on the level of detail needed in a GHG reduction plan. The Court of appeal found a city's GHG reduction plan inadequate given its reliance on mitigation measures that are "nonexclusive, undefined, untested and of unknown efficacy." (*Id.* at 93). The Court found that to be adequate, the plan should include measures that are "**known to be feasible,**" "coupled with **specific and mandatory performance standards**." (*Id.* at 94, emphasis added).

Further, CEQA mandates that "[i]f there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, **an EIR must be prepared for the project**." (Section 15183.5(b)(2), emphasis added.)

The City's own staff admit that the CAP is not being implemented, and that emission reduction targets are not being met. This provides substantial evidence that individual projects in the City are resulting in significant GHG impacts.

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Thus, the City's continued reliance on a CAP that fails to meet the criteria under Section 15183.5 as a streamlining tool violates CEQA. Individual projects must individually analyze and mitigate GHG impacts through preparation of environmental impact reports until the CAP is brought into compliance with CEQA.

V. Necessary Revisions to the CAP

In addition to fully complying with the CAP's implementation requirements and strategies, Preserve Calavera provides the following remedial measures necessary to bring the CAP into compliance with CEQA:

- Hire a full-time, qualified CAP coordinator, who will ensure compliance with the CAP's implementation, monitoring, and inventory requirements.

[7] https://opr.ca.gov/docs/OPR_C8_final.pdf, p. 229.

- Identify the funding necessary for successful implementation, and secure the funding before any continued reliance on the CAP as a streamlining tool. Seek new sources including through Measure X, cannabis taxes, grants, and developer impact fees.
- Ensure timely, annual progress reports, which include the detail and monitoring data that was promised in the CAP.
- Timely prepare an updated GHG inventory.
- Swiftly remedy failed strategies, and either revise or replace with measures that have known feasibility.
- Opt into the Clean Energy Alliance at the 100% renewal energy level.
- Adopt an all-electric ordinance for *all* new construction.
- Increase requirements of individual Projects to ensure CAP implementation, through financial contributions to the CAP, mitigation measures, and project design features.
- Expand the TDM program to all land uses with a lower threshold, and ensure the TDM programs are actually monitored and implemented.

VI. Conclusion

Preserve Calavera requests a meeting with the City to discuss the concerns raised herein, as well as the remedial actions and steps that are necessary to bring the City back into compliance with CEQA. As we underscored above, the City cannot continue to rely on its CAP for CEQA streamlining purposes unless and until it remedies the identified deficiencies, secures funding, and implements its CAP.

We are available at your earliest convenience. Please do not hesitate to email or call with any questions.

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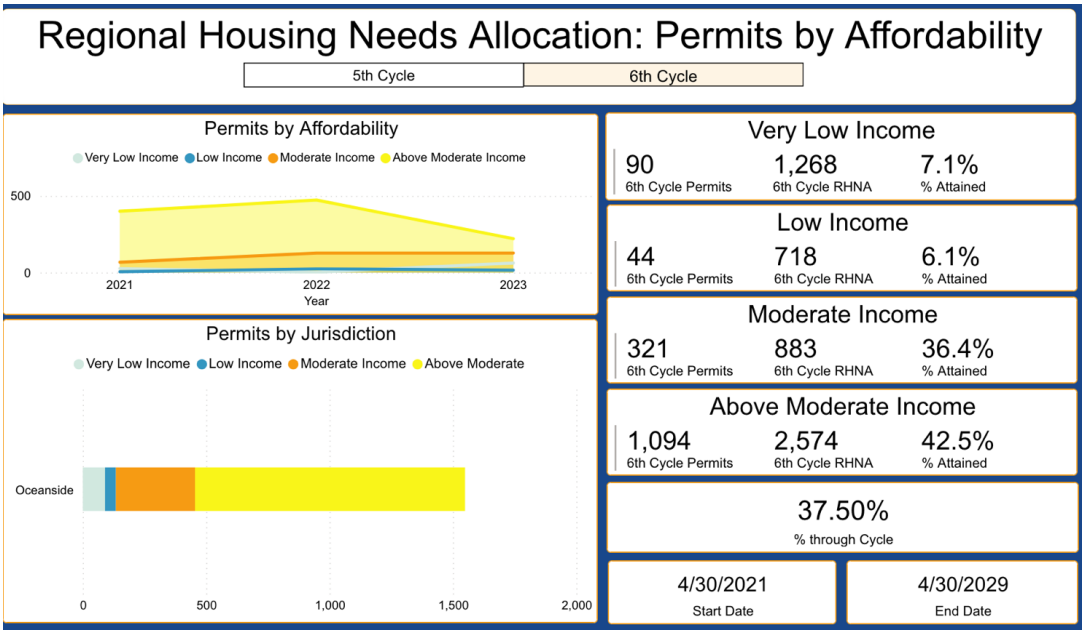
Sincerely,

Kathryn Pettit
Josh Chatten-Brown

cc

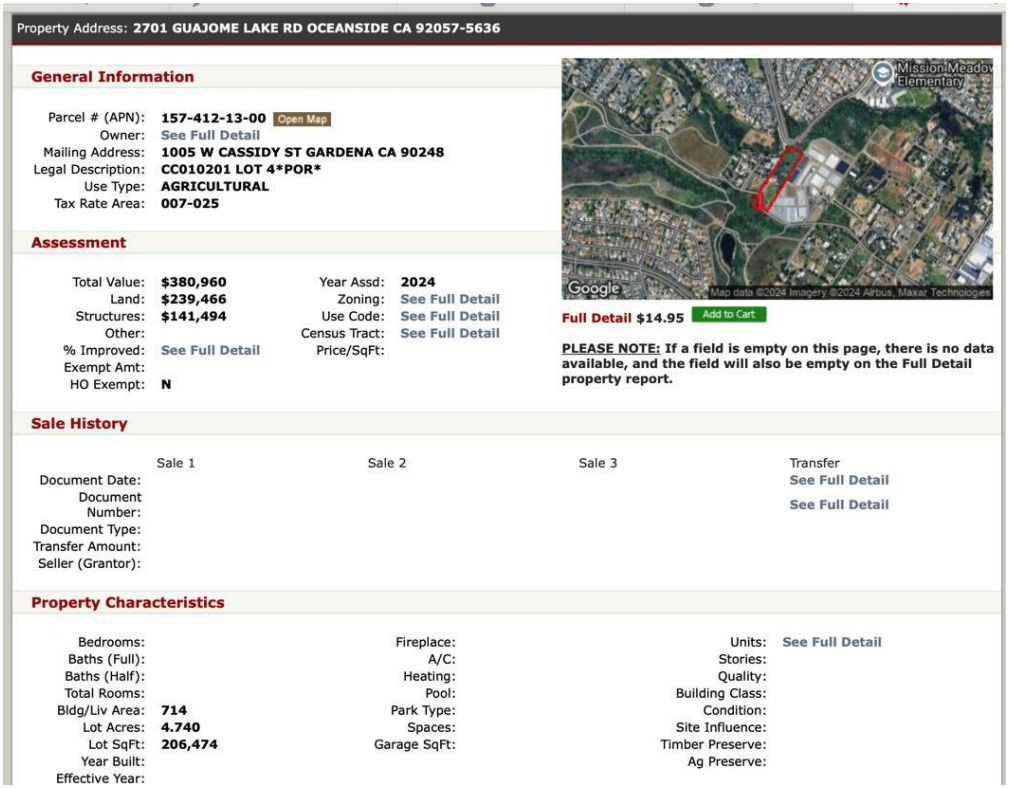
Oceanside City Attorney

Attachment C: San Diego County RHNA Dashboard for Oceanside



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Cont.

Attachment D: Description of Nearby Property Under Contract for Purchase



Property Address: **2701 GUAJOME LAKE RD OCEANSIDE CA 92057-5636**

General Information

Parcel # (APN):	**157-412-13-00** Open Map
Owner:	See Full Detail
Mailing Address:	**1005 W CASSIDY ST GARDENA CA 90248**
Legal Description:	**CC010201 LOT 4*POR***
Use Type:	**AGRICULTURAL**
Tax Rate Area:	**007-025**

Assessment

Total Value:	**$380,960**	Year Assd:	**2024**
Land:	**$239,466**	Zoning:	See Full Detail
Structures:	**$141,494**	Use Code:	See Full Detail
Other:		Census Tract:	See Full Detail
% Improved:	See Full Detail	Price/SqFt:	
Exempt Amt:			
HO Exempt:	**N**		

Full Detail $14.95 Add to Cart

PLEASE NOTE: If a field is empty on this page, there is no data available, and the field will also be empty on the Full Detail property report.

Sale History

	Sale 1	Sale 2	Sale 3	Transfer
Document Date:				See Full Detail
Document Number:				See Full Detail
Document Type:				
Transfer Amount:				
Seller (Grantor):				

Property Characteristics

Bedrooms:		Fireplace:		Units:	See Full Detail
Baths (Full):		A/C:		Stories:	
Baths (Half):		Heating:		Quality:	
Total Rooms:		Pool:		Building Class:	
Bldg/Liv Area:	**714**	Park Type:		Condition:	
Lot Acres:	**4.740**	Spaces:		Site Influence:	
Lot SqFt:	**206,474**	Garage SqFt:		Timber Preserve:	
Year Built:				Ag Preserve:	
Effective Year:					

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STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
651 Bannon Street, Suite 400, Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

December 12, 2024

Elyse Lowe, Development Services Department Director
City of San Diego
202 C St.
San Diego, CA 92101

Dear Elyse Lowe:

RE: 970 Turquoise Street Project, San Diego – Letter of Technical Assistance

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding the application of the State Density Bonus Law (SDBL)[1] to the development project proposed at 970 Turquoise Street (Project). This letter provides technical assistance for the City of San Diego (City) and the Project applicant regarding the use of incentives and waivers under the SDBL.

Project Description and Background

HCD understands that the Project would comprise 74 dwelling units, of which five would be deed-restricted affordable to very low-income (VLI) households and another five would be deed-restricted affordable to moderate-income (MI) households, plus 139 visitor accommodation units, which are a commercial use under the City's Municipal Code.[2]

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The Project's base density allows for 31 units. The Project is eligible for a 50-percent bonus (16 additional units) for the VLI units[3] and an additional 50-percent bonus (16 additional units) for MI units[4] under the SDBL. The Project is also eligible for an 11-unit bonus under the City's three-bedroom bonus provisions.

In addition, the Project is eligible for three incentives or concessions for providing the VLI units[5] and is also eligible for waivers or reductions of development standards which would have the effect of physically precluding the construction of the Project resulting from the use of those concessions or incentives.[6]

[1] Gov. Code, § 65915.
[2] San Diego Municipal Code, § 131.0112, subd. (a)(6)(K), available at https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division01.pdf.
[3] Gov. Code, § 65915, subd. (f)(2).
[4] Gov. Code, § 65915, subd. (v)(2).
[5] Gov. Code, § 65915, subd. (d)(2)(C).
[6] Gov. Code, § 65915, subd. (e)(1).

The Project applicant proposes to use an incentive to receive an additional 2.31 Floor Area Ratio (FAR) for the commercial component. The applicant further requests a waiver of the zoned 60-foot height limit and the 30-foot height limit under the City's Proposition D, for a proposed height of 240 feet, since those height limits would physically preclude construction of the Project with the additional 2.31 FAR.

The City has requested technical assistance on the following questions:

<u>Question #1</u>: The City understands that incentives and waivers may be provided for non-residential uses. Given that the waivers for height and FAR are predominantly for the non-residential use, does HCD have guidance as to what factors the City may evaluate and to what extent can those waivers and incentives be used to increase the non-residential use component?

The SDBL states that a city shall grant a requested concession or incentive unless the city makes one of three findings, one of which is particularly relevant here.[7] That finding is that the incentive or concession does not "result in identifiable and actual cost reductions… *to provide for affordable housing costs*, as defined in Section 50052.5 of the Health and Safety Code, *or for rents for the targeted units* to be set as specified in subdivision (c)."[8] (Emphasis added.) Section 50052.5 of the Health and Safety Code defines "affordable housing cost" for owner-occupied housing for extremely low-income (ELI), VLI, low-income (LI) and MI households. Moreover, SDBL requires that "rents for the lower-income density bonus units shall be set at an affordable rent, as defined in Section 50053 of the Health and Safety Code."[9]

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In other words, the incentive or concession must not just reduce costs (i.e., support the economic feasibility of the Project); that reduction in cost must be for the purposes of *providing affordable housing for lower-income or moderate-income households*.

The statute does not provide precise direction regarding how to determine whether the benefit of a requested incentive or concession has the requisite nexus to the provision of affordable housing. However, the Legislature's intent language provides helpful direction in implementing the SDBL provisions regarding waivers and incentives. The statute reads:

> "In enacting this chapter it is the intent of the Legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter *shall contribute significantly to the economic feasibility of lower income housing* in proposed housing developments."[10] (Emphasis added.)

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[7] Gov. Code, § 65915, subd. (d)(1).
[8] Gov. Code, § 65915, subd. (d)(1)(A).
[9] Gov. Code, § 65915, subd. (c)(1)(B)(i).
[10] Gov. Code, § 65917.

Again, the Legislature has made it clear that the purpose of incentives is to support the economic feasibility *of lower-income housing* specifically. The statute further reads:

> "The Legislature finds and declares that the intent behind the Density Bonus Law is to allow public entities to reduce or even eliminate subsidies for a particular project by allowing a developer to include more total units in a project than would otherwise be allowed by the local zoning ordinance *in exchange for* affordable units. It further reaffirms that the intent is to cover at least some of the financing gap *of affordable housing* with regulatory incentives, rather than additional public subsidy."[11] (Emphasis added.)

The City could conclude that the requested incentive in this case directly facilitates the affordable housing, in which case the SDBL compels the City to approve the requested incentive and associated waiver. On the other hand, the City might conclude that the Project does not need the requested incentive to cover the cost of "provid[ing] for affordable housing costs."[12] If the City so concludes, the SDBL places the burden of proof on the City to deny the requested incentive and associated waiver by making a written finding, based on substantial evidence, that the incentive does not result in identifiable and actual cost reductions to provide for affordable housing.[13]

Question #2: What guidance does HCD have for cities to define what is an amenity eligible for density bonus and waivers compared to what is an entirely new project component?

"Amenity" is not a term used in the SDBL. The concept of an amenity has been discussed in appellate court decisions, most notably in the context of courtyards.[14] A visitor accommodation use is not an amenity but rather a separate land use in a mixed-use project. Mixed-use projects are eligible for SDBL incentives, concessions, and waivers, consistent with the information provided in response to Question #1 above.

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Question #3: When evaluating a mixed-use project, is there a minimum amount of residential component to justify that the project is in fact a housing development? Are there any parameters that would prevent the applicant from providing 1 percent of the square footage for housing and 99 percent of the square footage for any non-residential use of its choice?

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[11] Gov. Code, § 65915, subd. (u)(1).
[12] Gov. Code, § 65915, subd. (d)(1)(A).
[13] Gov. Code, § 65915, subds. (d)(1)(A), (d)(4).
[14] See, for example, Wollmer v. City of Berkeley, 179 Cal.App.4th 933 (2009) [102 Cal.Rptr.3d 19] and Bankers Hill 150 v. City of San Diego, 74 Cal.App.5th 755 (2022) [289 Cal.Rptr.3d 268].

The SDBL statute does not include a definition of "mixed-use developments" and does not explicitly require a minimum residential component (other than the minimum required five residential units).[15] However, an SDBL project would be subject to a jurisdiction's zoning requirements unless it were eligible for a concession, incentive, or waiver. For this Project, the amount of non-residential use would naturally be limited by the City's zoning requirements (including FAR and height limits) unless the Project uses a concession, incentive, or waiver to increase those limits. As discussed in the response to Question #1 above, the value of the concessions, incentives, or waivers must directly facilitate the proposed quantity and depth of affordability of the affordable units. A project whose floor area is 99 percent commercial and 1 percent residential would likely be outside of these parameters and the concessions, incentives, or waivers needed to achieve that ratio would likely not be required under the SDBL.

Finally, the SDBL statute reads, "This chapter shall be interpreted liberally in favor of producing the maximum number of total housing units."[16] While the SDBL contains no explicit requirement for a minimum percentage of residential floor area in a mixed-use development,[17] an interpretation that a project with the minimum of five residential units is essentially entitled to a theoretically infinite amount of non-residential floor area could result in an absurd outcome that does not further the fundamental purpose of the SDBL.

Question #4: If visitor accommodation uses operate as a residential use with long-term stays, can visitor accommodations and vacation rentals count towards density bonus? If so, should the units be reported as permitted units on a Housing Element Annual Progress Report for purposes of tracking RHNA progress?

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Cont.

The answer is "no." The visitor accommodation use is deemed a commercial use in the City's municipal code. In addition, the Project has already maximized the number of housing units allowed on the site on top of the 31 units allowed under the base density. There would be no legal way for the visitor accommodation units to be added to the project as housing units. Accordingly, the visitor accommodation units are considered commercial uses, not housing units, and cannot be counted for the purposes of the SDBL, nor can they be reported as housing units on an Annual Progress Report.

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[15] Gov. Code, § 65915, subd. (i).
[16] Gov. Code, § 65915, subd. (r).
[17] In contrast, the Housing Accountability Act provides that, to qualify as a "housing development project," a mixed-use project must have "at least two-thirds of the square footage designated for residential use." (Gov. Code, § 65589.5, subd. (h)(2)(B).) Note that this definition is used in nearly every one of California's housing laws, including but not limited to the Streamlined Ministerial Approval Process (Gov. Code, § 65913.4 (m)(7)), the Housing Crisis Act of 2019 (Gov. Code, § 66300, subd. (a)(6)), the Permit Streamlining Act (Gov. Code, § 65940, subd. (d)), and the Affordable Housing and High Road Jobs Act (Gov. Code, § 65912.101, subd. (e)).

Question #5: If visitor accommodation uses operate as a residential use with long-term stays, are there additional provisions of state law that would allow the City to require a deed-restriction for affordable housing?

As discussed in the response to Question #4 above, the visitor accommodation units are considered commercial uses, not housing units. Therefore, the visitor accommodation units cannot serve as deed-restricted affordable housing units.

Conclusion

The SDBL permits the City to approve the requested incentive and associated waiver *or* to deny the requested incentive and associated waiver by making a written finding, based on substantial evidence, that the incentive does not result in identifiable and actual cost reductions to provide for affordable housing. In addition, the proposed visitor accommodation units must be considered a commercial use, not a residential use.

HCD appreciates the opportunity to provide technical assistance on this matter. If you have any questions regarding the content of this letter or would like additional technical assistance, please contact Stephanie Reyes at Stephanie.Reyes@hcd.ca.gov.

Sincerely,

Shannan West
Housing Accountability Unit Chief

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Cont.

III. RESOURCES AND OPPORTUNITIES

A variety of resources are available for the development, rehabilitation, and preservation of housing in Oceanside. This chapter provides an overview of the land resources and development opportunities available to address the City's overall regional housing need allocation, while describing the financial and administrative resources available to facilitate the provision of affordable housing. Additionally, this chapter discusses opportunities for energy conservation, which can lower utility costs and increase housing affordability.

A. Land Resources

As discussed in the previous chapter, Oceanside's housing growth need for the 2021-2029 period has been established as 5,443 units. The Housing Element is required to identify adequate sites that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels[18]. This "adequate sites" requirement may be satisfied in the following ways:

- New housing units permitted after the beginning of the planning period (June 30, 2020);
- New projects "in the pipeline" that have been approved for development or are currently under review; or
- Potential new units that could be built on vacant or underutilized properties.

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1. Progress Toward the RHNA 2021-2029

The City's progress toward the RHNA during 2021-2029 is described below and summarized in Table 22. Detailed information on the progress is summarized in Appendix B.

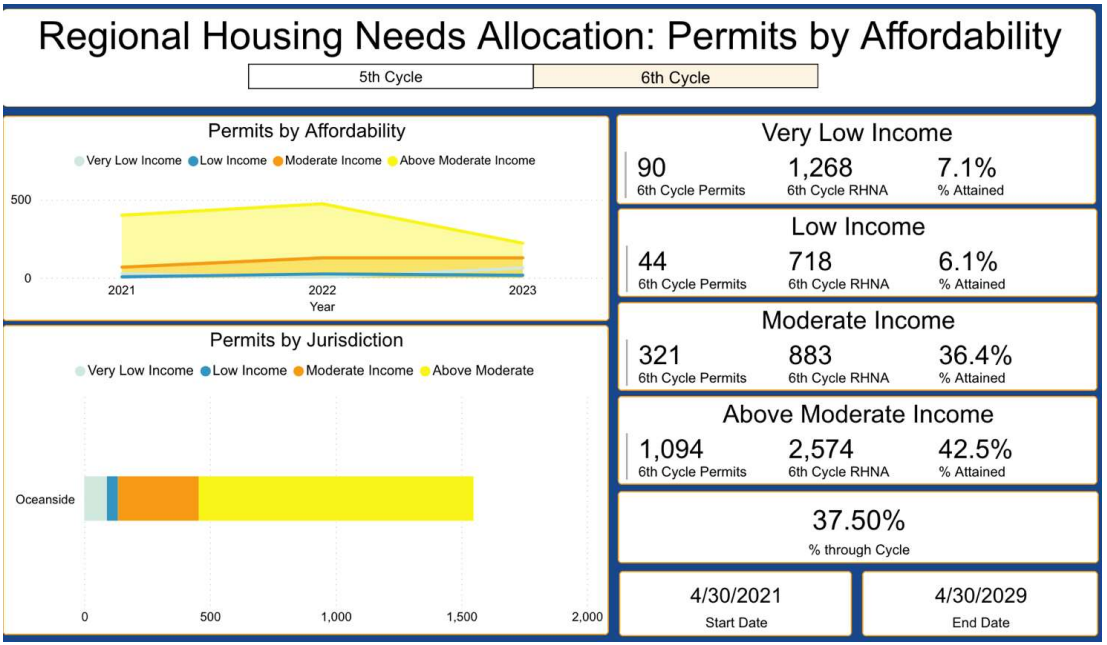
Table 22: Progress Toward the 2021-2029 RHNA

Income Categories	ADU	Approved	Entitled	Under Review	Total Credits	RHNA	Remaining Need
EL/ VL	0	26	0	100	126	1,268	1,142
Low	32	11	0	20	63	718	655
Mod	224	0	0	0	224	883	659
Above Mod	0	713	118	1,800	2,631	2,574	0
Total	256	750	118	1,920	3,044	5,443	2,456

Source: City of Oceanside, 2022

[18] Government Code §65583.2

Attachment C: San Diego County RHNA Dashboard for Oceanside



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