Buccaneer Lift Station and Force Main Project

Appendix F – Public Comment Letters and Responses

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RESPONSES TO COMMENTS

INTRODUCTION

As required by the California Environmental Quality Act (CEQA), the Draft Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the Buccaneer Lift Station and Force Main Project (Project) was circulated for a 30-day public review period beginning on June 8, 2026, and ending on July 8, 2026 (SCH No. 2026060391). During this period, comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the proposed Program might be avoided or mitigated" were accepted by the City pursuant to CEQA Guidelines Section 152049(a). Comment letters received during the public review period are shown on the matrix below. A copy of each comment letter along with corresponding responses has been included. Letters and responses are provided in side-by-side format for ease of reader review.

Letter Identification	Commenting Party	Comment Numbers
A	California Department of Fish and Wildlife	A-1 through A-11
B	California Department of Transportation (District 11)	B-1 through B-6
C	Preserve Calavera	C-1 through C-16
D	Colleen Balch	D-1 through D-6
E	Sheri Mackin – July 3, 2026	E-1
F	Sheri Mackin – July 6, 2026	F-1 through F-12
G	Cindy Shoup	G-1 through G-8

The City has reviewed all public comments received on the Draft IS/MND and provided a written response to all comments pertaining to substantive environmental issues and/or the adequacy of the Draft IS/MND. Several comment letters received during the public review period contained requests for revisions that resulted in minor changes and text clarifications to the Draft IS/MND text. These changes to the text are indicated by strikeout (deleted) and underline (inserted) markings in the Final IS/MND. Some of the comments do not pertain to the adequacy of analysis in the Draft IS/MND or to other aspects pertinent to the potential effects of the proposed project on the environment pursuant to CEQA. Regardless, a good faith effort has been made to respond to the comments submitted where they may touch on a relevant environmental topic.

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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

July 7, 2026

Shannon Vitale
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054
SVitale@oceansideca.org

Subject: Draft Mitigated Negative Declaration for the Buccaneer Lift Station and Force Main Project, SCH No. 2026060391, San Diego County, CA

Dear Shannon Vitale:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Mitigated Negative Declaration (MND) from the City of Oceanside (City) for the Buccaneer Lift Station and Force Main Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

A-1 Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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

[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.

A – California Department of Fish and Wildlife (CDFW)

A-1 The City acknowledges these introductory comments and description of the California Department of Fish and Wildlife's (CDFW's) role pursuant to the California Environmental Quality Act (CEQA). This comment does not raise an issue concerning the environmental analysis or adequacy of the Draft Initial Study (IS)/Mitigated Negative Declaration (MND); no response is required.

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A-1 cont.

specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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 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 (Fish and Game Code 2800 et seq.).

A-2

PROJECT DESCRIPTION SUMMARY

Proponent: City of Oceanside (City)

Objective: The objective of the Project is to replace the La Salina Wastewater Treatment Plant (LSWWTP) and provide additional infrastructure improvements. The LSWWTP was originally constructed in 1948 and serves as the connection point for multiple regional discharge pipelines including treated effluent from Fallbrook, Camp Pendleton, and the San Luis Rey Water Reclamation Facility (SLRWRF); as well as brine from the Mission Basin Desalting Facility and an industrial discharger. These flows are combined at or near the LSWWTP site before being discharged to the ocean from the City's Ocean Outfall Pipeline. The Project proposes the following components:

Former LSWWTP Site (Buccaneer Lift Station): The Project will demolish the existing LSWWTP and construct a new sewer lift station in its place. Improvements will include relocating the existing ultraviolet stormwater treatment facility, constructing underground load equalization and emergency storage tanks, and completing associated utility improvements. The Project will also establish native landscaping, a public parking lot for coastal access, a bicycle and pedestrian path along Loma Alta Creek, rehabilitation of an existing maintenance boat ramp, installation of protective fencing, and establishment of a biological buffer adjacent to the creek.

Buccaneer Force Main: The Project will also improve the City's wastewater conveyance system to redirect wastewater flows from the former LSWWTP to the San Luis Rey Water Reclamation Facility via the Buccaneer Lift Station and

[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."

A-2 The City acknowledges the summary of the project description as disclosed in the Draft IS/MND, including the project objectives, location, timeframe, biological setting, and project history. This comment does not raise an issue concerning the environmental analysis or adequacy of the Draft IS/MND; no response is required.

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A-2 cont.

associated force mains. These improvements include rerouting existing sewer and force mains and constructing associated utility infrastructure along the Project alignment.

Location: The 41.7-acre Project site includes linear underground infrastructure extending from the intersection of Mesa Drive and Garrison Street south to Oceanside Boulevard, then southwest to the LSWWTP (1110 South Pacific Street), in the City of Oceanside (Attachment A, Figure 1). The Project will be constructed within existing roadways or developed areas except for limited areas adjacent to coastal sage scrub, non-native grassland, and disturbed habitats. The former LSWWTP site is immediately adjacent to Loma Alta Creek, Loma Alta Marsh, Buccaneer Beach Park, and the Pacific Ocean.

Timeframe: Project construction would occur over approximately 32 months.

Biological Setting: Per the Biological Resources Letter Report (BRLR; HELIX 2024), the Project encompasses two distinct biological settings. The LSWWTP site is located within an urbanized coastal setting immediately adjacent to the sensitive aquatic and wetland habitats of Loma Alta Creek and Loma Alta Marsh. These locations provide important estuarine, riparian, and coastal wetland functions. Although the LSWWTP site is largely developed, adjacent waters, wetlands, marsh vegetation, and open water provide habitat for numerous sensitive wildlife species. Approximately 0.11 acre of ephemeral stream traverses the LSWWTP site, and cismontane alkali marsh and open water occur immediately southeast of the site (Attachment A, Figure 2). In contrast, the linear sewer and force main improvements would occur primarily within existing roadways and other developed areas.

Vegetation and land cover types within the Project impact area include 38.4 acres of developed land, 2.6 acres of disturbed habitat, 0.50 acre of non-native grassland, and 0.30 acre of non-native vegetation. Coastal sage scrub habitat occurs off-site and adjacent to the eastern portion of the sewer alignment northeast of Oceanside Boulevard and El Camino Real.

Based on CDFW's review of the BRLR and California Natural Diversity Database[3] (CNDDB) records, the following species were detected or have the potential to occur within or adjacent to the Project site:

- light-footed Ridgway's rail (*Rallus obsoletus levipes*; ESA-listed endangered, CESA-listed endangered, Fully Protected (FP))
- California least tern (*Sternula antillarum* browni; ESA-listed endangered, CESA-listed endangered, FP);
- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*; CESA-listed endangered)

[3] https://wildlife.ca.gov/Data/BIOS

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- coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed threatened, California Species of Special Concern (SSC); gnatcatcher)
- white-faced ibis (*Plegadis chih*; CDFW Watch List (WL))
- southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; WL)

HELIX biologists conducted general biological surveys within the Project area in 2018, 2019, and 2024. Survey results indicated no special-status plants are expected within the Project area. California least tern has moderate nesting potential within the former LSWWTP site and moderate foraging potential within Loma Alta Creek. Light-footed Ridgway's rail, Belding's savannah sparrow, and white-faced ibis have moderate potential to occur within Loma Alta Creek and associated marsh habitats. Coastal California gnatcatcher and southern California rufous-crowned sparrow have moderate nesting potential within coastal sage scrub adjacent to the eastern portion of the sewer alignment.

A-2 cont.

The Project will impact 41.9 acres, including disturbed habitat (2.6 acres), non-native grassland (0.50 acre), ephemeral stream (0.11 acre), non-native vegetation (0.3 acre), and developed land (38.4 acres). No mitigation for impacts to upland vegetation types is proposed.

The MND incorporates Mitigation Measures (MM) BIO-1 through BIO-4 to avoid and minimize impacts to sensitive habitats, jurisdictional resources, and special-status wildlife through pre-construction surveys, construction fencing, biological monitoring, and implementation of best management practices (BMPs). Where impacts cannot be avoided, the measures require coordination with wildlife agencies and compliance with applicable regulatory requirements, including consultation and permitting with the U.S. Fish and Wildlife Service under the federal Endangered Species Act (ESA), the California Endangered Species Act (CESA), and the Lake and Streambed Alteration provisions of the California Fish and Game Code (§§1600–1603).

Project History: In March 2026, CDFW provided a comment letter on the Draft Programmatic Environmental Impact Report for the Oceanside Sewer Improvements Program (SCH No. 2021030277), which provided a programmatic vision for modernizing the City's wastewater system, including the proposed Project.

COMMENTS AND RECOMMENDATIONS

A-3

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.

A-3 The City acknowledges this introductory comment. Please see the responses to each comment and associated recommendations below.

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COMMENT # 1: Impacts to Light-footed Ridgway's Rail

Issue: The MND does not clearly address CDFW's regulatory protections for light-footed Ridgway's rail, a State Fully Protected species, nor does it clearly demonstrate how Project activities would avoid impacts to this species.

Specific Impact: Per the BRLR, light-footed Ridgway's rail has a moderate potential to occur adjacent to the Project site, within 500 feet and within the Loma Alta Creek. The MND also concludes significant indirect impacts could occur to rails nesting with Loma Alta Creek during construction (lighting and noise). Although the MND includes nesting pre-construction survey requirements, the mitigation measures do not clearly address the species' Fully Protected status or how Project activities would avoid potentially significant impacts to rail. Additionally, the measures focus on detection of active nests, which may not adequately protect rail because nests are difficult to detect within dense marsh vegetation. Nests and hatchlings are challenging to detect even when surveys are conducted by experienced biologists, due to the size and cryptic coloration of the species.

A-4

Why Impact Would Occur: Light-footed Ridgway's rail occupy marsh and riparian habitats and may be sensitive to disturbance from nearby construction activities. Project activities such as grading, staging, and operation of heavy equipment adjacent to Loma Alta Creek may result in disturbance to nearby rail habitat. Construction-related noise, vibration, and increased human activity occurring near occupied habitat during the breeding season could also disrupt breeding behavior or result in nest abandonment, which may constitute take under the Fish and Game Code § 3503.

Evidence Impact May Be Significant: Light-footed Ridgway's rail is designated as a Fully Protected species under the California Fish and Game Code §3511 and take of Fully Protected species is prohibited. Project activities must be designed to avoid take of the species as no permit can be issued to allow for the take of Fully Protected Species. Additionally, light-footed Ridgway's rail is listed as endangered under both the federal Endangered Species Act and the California Endangered Species Act and take of the species is prohibited unless authorized by law (Fish & G. Code, §§ 2080, 3511).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following are incorporated into the final CEQA document:

Recommendation #1 Light-footed Ridgway's Rail Disclosure: The MND should clarify how Project activities will avoid potentially significant impacts to light-footed Ridgway's rail and revise the mitigation measures to address the species' Fully Protected status. The MND should also clarify that coordination with CDFW will be required to ensure impacts to the species will be fully avoided.

A-4 The City acknowledges that the project has the potential to result in indirect impacts to light-footed Ridgeway's rail. The Draft IS/MND noted that the species is both state and federally listed as endangered, and the Final IS/MND has been revised to clarify that it is also a state Fully Protected species. In response to the recommendation provided in this comment, mitigation measure BIO-1 in the Final IS/MND has been revised to include the recommended measure as MM BIO-1b. Incorporation of the requested revision ensures that the IS/MND adequately describes how potentially significant impacts to the species would be avoided and addresses CDFW's regulatory protections for this species.

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A-4 cont.

Mitigation Measure #1 Light-footed Ridgway's Rail Avoidance and Monitoring: Take of light-footed Ridgway's rail shall be fully avoided (Fish & G. Code § 3511). To the extent feasible, Project activities within 500 feet of suitable native wetland and riparian habitats (e.g. Loma Alta Creek) shall occur between September 16 and March 14 to avoid the breeding season for light-footed Ridgway's rail. For Project activities at any time of year, a qualified biologist shall be present on site to conduct pre-activity surveys, monitor for light-footed Ridgway's rail, and monitor Project-generated noise levels during all work within 500 feet of marsh habitat. If Project-generated noise exceeds 30 dBA above ambient noise levels at suitable or occupied rail habitat, or if the qualified biologist determines Project activities are causing behavioral disturbance or may result in take of light-footed Ridgway's rail, Project activities shall immediately cease or be modified as necessary to avoid take. Modifications may include implementation of noise attenuation, temporary cessation of particular noisy activities, changes to construction methods or equipment, limited operating periods, or other avoidance measures determined necessary by the qualified biologist. No flushing of rail shall be authorized. The qualified biologist shall have the authority to stop work whenever necessary to avoid take of the species.

A-5

COMMENT # 2: Impacts to California Least Tern

Issue: The MND does not clearly address CDFW's regulatory protections for California least tern, a State Fully Protected species, nor does it clearly demonstrate how Project activities would avoid impacts to this species.

Specific Impact: Per the BRLR, California least tern has a moderate potential to nest within the Project site and to forage adjacent to the Project site within the Loma Alta Creek. Although the MIND requires pre-construction nesting surveys and implementation of avoidance measures (e.g., work stoppage, establishment of nest buffers, and noise attenuation) if California least tern are detected, the mitigation measures do not include breeding season restrictions and do not clearly address the species' Fully Protected status or how Project activities would avoid potentially significant impacts to California least tern.

Why impact would occur: California least tern occupy paved or open areas devoid of vegetation and may be sensitive to disturbance from nearby construction activities. Project activities such as grading, staging, construction and operation of heavy equipment at the LWWSF may result in disturbance to California least tern habitat. Construction-related noise, vibration, and increased human activity occurring within occupied habitat during the breeding season could also disrupt breeding behavior or result in nest abandonment, which may constitute take under the Fish and Game Code § 3503.

Evidence impact would be significant: California least tern is designated as a Fully Protected species under the California Fish and Game Code §3511 and take of

A-5 The City acknowledges that the project has the potential to result in impacts to California least tern. The Draft IS/MND noted that the species is both state and federally listed as endangered, and the Final IS/MND has been revised to clarify that it is also a state Fully Protected species. In response to the recommendation provided in this comment, mitigation measure BIO-1 in the Final IS/MND has been revised to include the recommended measure as MM BIO-1c. Incorporation of the requested revision ensures that the IS/MND adequately describes how potentially significant impacts to the species would be avoided and addresses CDFW's regulatory protections for this species.

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Fully Protected species is prohibited. Project activities must be designed to avoid take of the species as no permit can be issued allowing for the take of Fully Protected Species. Additionally, California least tern is listed as endangered under both the federal Endangered Species Act and the California Endangered Species Act and take of the species is prohibited unless authorized by law (Fish & G. Code, §§ 2080, 3511).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

A-5 cont.

Recommendation #2 California Least Tern Disclosure: The MND should clarify how Project activities will avoid potentially significant impacts to California least tern and revise the mitigation measures to address the species' Fully Protected status. The MND should also clarify that coordination with CDFW will be required to ensure impacts to the species will be fully avoided.

Mitigation Measure #2 California Least Tern Avoidance and Monitoring: Take of California least tern shall be fully avoided (Fish & G Code § 3511). CDFW recommends Project activities within 500 feet of suitable nesting habitat be conducted outside of the California least tern breeding season (April 1 through September 15). If work during the breeding season cannot be avoided, preconstruction surveys should be conducted by a qualified biologist. If California least tern nesting activity is detected within or adjacent to the Project area, Project activities shall be modified, delayed, or suspended as necessary to avoid take of the species. The qualified biologist shall have the authority to stop work if deemed necessary for any reason to protect the species. Additional avoidance measures such as noise attenuation or work restrictions may be required in consultation with CDFW to ensure take of California least tern does not occur.

ADDITIONAL COMMENTS

A-6

1. **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

A-6 The City acknowledges CDFW's recommendations regarding the project's mitigation for light-footed Ridgeway's rail and California least tern, and has made revisions as applicable. Refer to responses A-4 and A-5 above.

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A-6 cont.

measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment B).

A-7

2. **Lake and Streambed Alteration.** The MND identifies aquatic resources within the Project area, including 0.11-acre (236 linear feet (LF)) of non-vegetated ephemeral streambed within the LSWWTP site. Construction of the Project will permanently impact this drainage and will alter the bed, bank, and channel of the adjacent creek. The Project proposes to dewater this drainage during construction and discharge the water directly into Loma Alta Creek. CDFW acknowledges that the City plans to submit written notification to CDFW pursuant to Fish & G. Code, § 1602 et seq, per MM-BIO-4. We look forward to coordinating with the City further on this notification. Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify the Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

A-8

3. **Avoidance of Nesting Birds and Raptors.** CDFW appreciates the inclusion of MM BIO-3 to address impacts to nesting birds and raptors protected under the California Fish and Game Code. Specifically, MM BIO-4 requires pre-construction nesting surveys no earlier than FIVE (5) days prior to start of construction activities to confirm the presence or absence of nesting birds and/or raptors. However, nesting birds may initiate nests quickly during the breeding season, and surveys conducted several days prior to construction may not accurately reflect current nesting conditions. Therefore, CDFW recommends MM BIO-4 be revised to require pre-construction nesting surveys to occur within three (3) days prior to the start of activities to ensure active nests are not inadvertently disturbed. CDFW also recommends that MM BIO-3 clarify that if construction activities are delayed for more than three (3) days after completion of the nesting bird survey, additional surveys shall be conducted prior to the initiation of construction.

A-9

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 California Natural Diversity Database (CNDDB). The CNDDB website[4] provides direction regarding the

[4] https://wildlife.ca.gov/Data/CNDDB

A-7 Mitigation measure BIO-4 states that the City will submit written notification to CDFW prior to the proposed project impacts to potentially jurisdictional resources, and notes that final mitigation requirements shall be determined during the permitting process in coordination with relevant agencies, including CDFW. The City acknowledges that a Lake and Streambed Alteration Agreement may be required, which could involve project modifications to eliminate or reduce potential impacts to fish and wildlife resources. The City will continue to coordinate with CDFW regarding jurisdictional aquatic resources. No further response is required.

A-8 To incorporate CDFW's recommendations regarding the timing of the pre-construction nesting surveys that would be required to be conducted prior to the project's initial grading and vegetation removal activities during the general nesting bird season for migratory birds and raptors, mitigation measure BIO-3 has been revised in the Final IS/MND as follows:

> **MM BIO-3**: **Nesting Bird and Raptor Avoidance**. Prior to initial grading and vegetation removal activities (i.e., earthwork, clearing, and grubbing) during the general nesting bird season for migratory birds and raptors (January 15 to September 15), the City shall retain a qualified biologist to perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and California Fish and Game Code. The pre-construction survey shall be performed no more than ~~five~~three (3) days before the commencement of the activities. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. The survey will remain valid while active construction is occurring. If construction is suspended for more than ~~one week~~three (3) days after completion of the nesting bird survey during the general breeding bird season, the survey shall be repeated before work activities can resume.

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types of information that should be reported and allows on-line submittal of field survey forms.

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[5].

A-9 cont.

The City should ensure data collected for the preparation of the MND is properly submitted.

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.)

A-10

CONCLUSION

CDFW appreciates the opportunity to comment on the MND 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 and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

A-11

Questions regarding this letter or further coordination should be directed to Alison Kalinowski[6], Environmental Scientist.

Sincerely,

Signed by:
Glen Lubcke
AD7D070BCB66466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Figure 1. Project Location
B: Figure 2. Wetland Habitats

[5] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit
[6] Alison.Kalinowski@wildlife.ca.gov

A-9 As requested in this comment and required per the noted regulations, the City and/or its Designated Representative(s) will report special status species and natural communities detected during project surveys to the California Natural Diversity Database (CNDDB) and CDFW's Vegetation Classification and Mapping Program, including all data collected for the preparation of the IS/MND. No further response is required.

A-10 The City acknowledges these comments regarding CDFW filing fee requirements. The required fees would be paid upon filing of the Notice of Determination. No further response is required.

A-11 The City acknowledges the comments provided by CDFW. Please refer to the above responses to specific comments. The Final IS/MND and notification of hearing date have been made available on the City's website.

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Attachment B: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Glen M. Lubcke, Environmental Program Manager
Jennifer Turner, Senior Environmental Scientist (Supervisor)
Alison Kalinowski, Environmental Scientist

Office of Land Use and Climate Innovation
State.Clearinghouse@ici.ca.gov

United States Fish and Wildlife Service
Jonathan Snyder, Acting Field Supervisor, Jonathan_d_Snyder@fws.gov

REFERENCES

California Department of Fish and Wildlife (CDFW). (March 2026). Comments on the Draft Program Environmental Impact Report for the Oceanside Sewer Improvements Program, SCH No. 2021030277, San Diego County, CA.

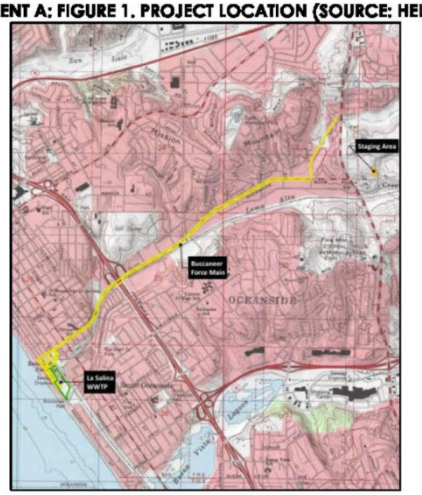
CDFW. (2026). California Natural Diversity Database (webpage). Available at: https://wildlife.ca.gov/Data/CNDDB.

California Fish and Game Commission. (2005). Miscellaneous Policies. Available at: https://fgc.ca.gov/About/Policies/Miscellaneous.

HELIX Environmental Planning (HELIX). (May 2024). Updated Biological Resources Letter Report for the La Salina Wastewater Treatment Plant Flow Diversion and Buccaneer Lift Station and Force Main Project.

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ATTACHMENT A: FIGURE 1. PROJECT LOCATION (SOURCE: HELIX 2026)



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ATTACHMENT A: FIGURE 2. WETLAND HABITATS (SOURCE: HELIX 2026)



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ATTACHMENT B: 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 Light-footed Ridgway's Rail Disclosure: The MND should clarify how Project activities will avoid potentially significant impacts to light-footed Ridgway's rail and revise the mitigation measures to address the species' Fully Protected status. The MND should also clarify that coordination with CDFW will be required to ensure impacts to the species will be fully avoided.	Prior to adoption of CEQA document	City
Take of light-footed Ridgway's rail shall be fully avoided (Fish & G. Code § 3511). To the extent feasible, Project activities within 500 feet of suitable native wetland and riparian habitats (e.g. Loma Alta Creek) shall occur between September 16 and March 14 to avoid the breeding season for light-footed Ridgway's rail. For Project activities at any time of year, a qualified biologist shall be present on site to conduct pre-activity surveys, monitor for light-footed Ridgway's rail, and monitor Project-generated noise levels during all work within 500 feet of marsh habitat. If Project-generated noise exceeds 30 dBA above ambient noise levels at suitable or occupied rail habitat, or if the qualified biologist determines Project activities are causing behavioral disturbance or may result in take of light-footed Ridgway's rail, Project activities shall immediately cease or be modified as necessary to avoid take. Modifications may include implementation of noise attenuation, temporary cessation of particular noisy activities, changes to construction methods or equipment, limited operating periods, or other avoidance measures determined necessary	Prior to Project Initiation, During Project Activities	City, Qualified Biologist

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Mitigation Measure	Timing	Responsible Party
by the qualified biologist. No flushing of rail shall be authorized. The qualified biologist shall have the authority to stop work whenever necessary to avoid take of the species.		
Recommendation #2 California Least Tern Disclosure: The MND should clarify how Project activities will avoid potentially significant impacts to California least tern and revise the mitigation measures to address the species' Fully Protected status. The MND should also clarify that coordination with CDFW will be required to ensure impacts to the species will be fully avoided.	Prior to adoption of CEQA document	City
Mitigation Measure #2 California Least Tern Avoidance and Monitoring: Take of California least tern shall be fully avoided (Fish & G Code § 3511). CDFW recommends Project activities within 500 feet of suitable nesting habitat be conducted outside of the California least tern breeding season (April 1 through September 15). If work during the breeding season cannot be avoided, preconstruction surveys should be conducted by a qualified biologist. If California least tern nesting activity is detected within or adjacent to the Project area, Project activities shall be modified, delayed, or suspended as necessary to avoid take of the species. The qualified biologist shall have the authority to stop work if deemed necessary for any reason to protect the species. Additional avoidance measures such as noise attenuation or work restrictions may be required in consultation with CDFW to ensure take of California least tern does not occur.	Prior to Project Initiation, During Project Activities	City, Qualified Biologist

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov

July 7, 2026

11-SD-5
PM 51.951
Buccaneer Lift Station and Force Main Project
MND/SCH#2026060391

Ms. Shannon Vitale
Principal Planner
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

Dear Ms. Vitale:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the Buccaneer Lift Station and Force Main Project located near Interstate 5 (I -5). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

B-1

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Oceanside in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

"Improving lives and communities through transportation."

B – California Department of Transportation (Caltrans)

B-1 The City acknowledges these introductory comments; however, they do not raise an issue concerning the environmental analysis or adequacy of the Draft IS/MND. Please see the responses below to specific comments.

B-1 (cont.)

between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

B-2

Hydrology and Drainage Studies

- Please provide project plans for work near and within Caltrans' Right of Way (R/W), include layouts, cross sections, and profiles. Please include all existing Caltrans drainage facilities in plans, where applicable.
- Based on exhibits provided, the project will encroach onto a FEMA 100-year floodway/floodplain. The proposed project features may significantly alter the FEMA defined Floodplain and associated water surface elevations through the project area and have potential adverse impacts to I-5 and SR-76 facilities. Caltrans requests that the City of Oceanside, acting as the Local FEMA Administrator, include Caltrans in reviews of all submittals to the Development Services Department (DSD) regarding floodplain administration and allow for the Department to comment prior to the Conditional Letter of Map Revision (CLOMR) application or the Permit issue, to assure that the Caltrans' assets are not adversely impacted by any change in the water surface elevation resulting from this project
- Per Title 44 CFR §65.12, Caltrans requests that a formal notification be sent to the Department when the City of Oceanside approves the permit to alter the floodplain and/or when the Developer applies for CLOMR and Letter of Map Revision (LOMR).
- On all plans, show Caltrans' R/W.
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

B-3

Hauling

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is

B-2 The City acknowledges the California Department of Transportation's (Caltrans') comments regarding hydrology, drainage, and floodplain considerations. The City will coordinate with Caltrans as applicable and provide Caltrans with project plans for work near and within Caltrans' Right of Way (R/W), which will be indicated on the plans.

Potential impacts related to hydrology, water quality, drainage, and floodplains raised in this comment are addressed in Checklist subsection X, *Hydrology and Water Quality*, of the IS/MND. As the Local Federal Emergency Management Agency (FEMA) Administrator, the City will include Caltrans in reviews of all submittals to the Development Services Department (DSD) regarding floodplain administration and will allow for comments prior to the Conditional Letter of Map Revision (CLOMR) application or the Permit issue. The City will additionally provide formal notification when the City approves the permit to alter the floodplain and/or when the formal process for a CLOMR and Letter of Map Revision (LOMR) is initiated.

B-3 This comment regarding potential impacts to Interstate (I-) 5 is noted. The City will coordinate with Caltrans should the project require special transportation permits for oversize/overweight vehicles, as well as if potential effects to operations of I-5 are identified. This comment does not raise an issue concerning the environmental analysis or adequacy of the IS/MND and no additional response is required.

B-3 (cont.)

responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: https://dot.ca.gov/programs/traffic-operations/transportation-permits.

Potential impacts to the highway facilities (I-5) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

B-4

Structures
The proposed location on Oceanside Boulevard crossing under I-5 will need to be reviewed by Caltrans HQ Structure Maintenance and Investigations.

Design
Proposed work under I-5 structure will need to be reviewed and approved by FHWA.

B-5

Environmental
For potential, subsequent approvals, such as encroachment permits, this project must specifically identify and assess potential impacts caused by the project and/or impacts from mitigation efforts that occur within or indirectly affect Caltrans' R/W that includes, but is not limited to, impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans will need to review the analysis for any work identified in Caltrans' R/W and any additional mitigation measures needed for encroachment approval.

The following is a list of typically impacted categories on Caltrans' facilities. Should there be any potential impact to Caltrans' facilities from this project we recommend that they be addressed as appropriate during the encroachment process.

- Noise
- Air Quality
- Hazardous Materials
- Community Impacts
- Visual/Aesthetic Impacts (including any removal of vegetation or trees)
- Biological Resources
- Cultural Resources
- Water Quality
- Agricultural/Farmland Impacts
- Traffic/Circulation

B-4 The City acknowledges this comment and will coordinate with and submit project plans for review by Caltrans HQ Structure Maintenance and Investigations and the Federal Highway Administration (FHWA) as applicable. This comment does not raise an issue concerning the environmental analysis or adequacy of the IS/MND and no additional response is required.

B-5 The City acknowledges the importance of a complete environmental review document for reliance by responsible agencies in issuing subsequent approvals. The IS/MND prepared for the project includes an analysis of each of the environmental issue areas listed in this comment and determined that no significant impacts would occur with mitigation incorporated.

Ms. Shannon Vitale, Principal Planner
July 7, 2026
Page 4

Right-of-Way
Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by visiting the website at https://dot.ca.gov/programs/traffic-operations/ep. Projects with the following:

- require a Caltrans Encroachment Permit
- have completed the Caltrans Local Development Review (LDR) process
- have an approved environmental document

need to have documents submitted for Quality Management Assessment Process (QMAP) process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Shannon Aston, LDR Coordinator, at (619) 992-0628 or by e-mail sent to shannon.aston@dot.ca.gov.

Sincerely,

Kimberly Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

"Improving lives and communities through transportation."

B-6

B-6 The proposed Buccaneer Force Main alignment in Oceanside Boulevard would cross under I-5. It is therefore expected that the project would require an encroachment permit from Caltrans. The Final IS/MND has been revised to include this permit requirement in Section 2.7, *Discretionary Approvals Required.*

From: Diane Nygaard <dnygaard3@gmail.com>
Sent: Monday, July 6, 2026 7:38 AM
To: Shannon Vitale <SVitale@oceansideca.org>
Subject: Comments on Buccandeer Lift Station MND

Ms. Vitale

C-1 The following comments are submitted on behalf of Preserve Calavera. Please reply to confirm timely receipt.

C-2 **Project Description**
- Inconsistent project description used for MND and technical studies
The MND project description includes a public parking lot and bike/pedestrian trail. These public facilities are not mentioned in App A Preliminary Design or the Biological Resources Letter so it does not appear that the impacts of these public facilities have been considered in the analysis that presumably was brought forward into the MND.

C-3 Page 8 of App F Feasibility Analysis to App A Preliminary Design includes the following in the section on Impact to Traffic and Public Activity; " All three alternatives are considered to have a high public impact as they pass by the Oceanside Transit Center,schools, churches, commercial and industrial zones." It further states these impacts were not analyzed because the impacts do not vary substantially between the alternatives.. These impacts are called out in the technical studies that did not even include the public parking lot and trail which would add to these potential impacts that have not been addressed in the MND..

C-4 -inconsistent size/description of parking lots
The public parking lot is identified as 46 spaces in at least one place and 65 spaces in others. We did not see mention of parking spaces provided within the plant, in addition to these public spaces. The text mentions that currently the site has 10-12 employees whereas after the construction there will be no FT employees on site. But there still of course is a need for staff to access the site. The description should clearly identify the size/location and access for all parking facilities.

C-5 - no justification of need for such a huge public parking lot.
The recent Buccaneer Park plan did not identify a need to increase parking and kept the exact same number of parking spaces. If these are not needed for the park or beach access then what are they needed for- the bike trail? Parking for the trail should be located inland, not in the coastal zone. If this land is available for public benefit then there should be an analysis of best use of the land. This is one more project that reminds us of the Joni Mitchell lyrics about paving paradise to put up a parking lot. Users of the bike trail should not be encouraged to drive to this land adjacent to the beach to park for hours while using a bike trail. There is much better public use potential in this area adjacent to the creek and a neighborhood park.

C-6 One wonders if this huge parking lot is actually a replacement for other lost parking in the coastal zone that has not been disclosed. If that is the case that needs to be properly considered as an indirect impact.

C – Preserve Calavera (via Diane Nygaard)

C-1 The City acknowledges receipt of this letter. Please refer to the following responses to the comments provided in this letter.

C-2 The project that is evaluated throughout the IS/MND is based on the description contained in Section 2.0, *Project Description*, which includes all project components, including the lift station, force main improvements, public parking lot, bike/pedestrian trail, landscaping, and other associated improvements. Consistent with this description, the Project Background and Description section contained on page 2 of the Biological Resources Letter Report includes, "Other LSWWTP site improvements would also occur, including the provision of a public parking lot, a bike/pedestrian path…." Thus, the public parking lot and bike/pedestrian trail are addressed in the report. The Preliminary Design Report was prepared to analyze preliminary design options, from which the City selected the proposed project. The IS/MND then took applicable portions of this Preliminary Design Report and expanded the analysis as needed to ensure all potential environmental impacts were thoroughly analyzed. As such, the analysis within the IS/MND, which was informed in part by these appendices, includes an analysis of impacts for the entirety of the project site. The IS/MND incorporates the complete project description and evaluates the environmental impacts of all project components. No revisions to the IS/MND are required in response to this comment.

C-3 As stated in response C-2 above, the Preliminary Design Report (Appendix A) was prepared to analyze preliminary design options, and the IS/MND then took applicable portions of this Preliminary Design Report and expanded the analysis as needed to ensure all potential environmental impacts were thoroughly analyzed. Refer to response C-2 for additional information. No revisions to the IS/MND are required in response to this comment.

C-4 The City acknowledges this comment regarding the description and size of the proposed parking lot. In the Final IS/MND, previous references to a parking stall count of 65 have been updated to 51 to reflect current site plans. The project would now result in a net increase of 43 spaces (51 spaces would be provided; however, 8 spaces would be lost along South Pacific Street). The comment correctly states that there would be no full-time employees at the site compared to 10 to 12 daily employees at the La Salina Wastewater Treatment Plant (LSWWTP) site under existing conditions. While the project involves the construction of a public parking lot, this component of the project is to accommodate existing visitors to the area, mostly Buccaneer Beach. Parking for staff associated with occasional site operations/maintenance would occur within the fenced area of the lift station site. As stated in the Final IS/MND, preliminary locations for ingress and egress for the proposed public parking lot along Pacific Street are shown on Figure 3 of the IS/MND and have been reviewed by City staff for emergency access and safety. In addition, the proposed project would result in the addition of three vehicle access points along Pacific Street at the LSWWTP site to allow for City access to the site for site operations and for the public to access the public parking lot.

C-5 The Buccaneer Park Re-Visioning Plan is a separate planning effort addressing future park improvements. The purpose of the parking lot component of the project site is to accommodate existing visitors to the area, mostly Buccaneer Beach. In accordance with Appendix G of the State CEQA Guidelines, the IS/MND included an analysis of whether the project would result in a significant environmental impact due to a conflict with applicable land use plans in Checklist Subsection XI, *Land Use and Planning*. The analysis includes evaluation of impacts related to consistency with the City's Local Coastal Program (LCP) and determined that the project would be consistent. Evaluation of the best use of land is not required pursuant to CEQA. This comment does not identify a deficiency in the environmental analysis contained in the IS/MND, and no revisions are required. However, the City has noted the commenter's preferences regarding land uses on the parking lot site.

C-6 The project description identifies the purpose and components of the proposed project, and the IS/MND evaluates direct and reasonably foreseeable indirect environmental impacts associated with the project. As stated in response C-5 above, the purpose of the parking lot component of the project is to accommodate existing visitors to the area. No revisions to the IS/MND are required in response to this comment.

Aesthetics

C-7 - fails to consider impacts associated with Buccaneer Park Plan.
After extensive public input, the city has approved a plan for rehabilitation of Buccaneer Park. The MND fails to even mention this approved plan, or to analyze potential impacts related to changed views and public use. The MND needs to properly analyze the impacts associated with this revised plan for the adjacent park and how this impacts views.

Biological Resources

C-8 - no analysis of potential impacts of public parking lot and trail
There is lots of documentation of the potential for adverse impacts on biological resources associated with increased public use. This trail is located on the edge of the project adjacent to what is identified on Figure 3 as "Biological Buffer" The trail is described as 10' wide, asphalt, with 2 foot shoulders in the sides. The MND mentions fencing to restrict public access to the treatment plant from the public parking lot and trail, but does not mention any protection of the biological buffer from this public use. Noise, trash, dogs are commonly associated with such public use and can adversely impact biological resources. Other studies have found that impacts from trail use extend 200 meters on each side of the trail- extending well into the biological buffer and potentially even into the habitat along the creek. The potential impacts have not been properly analyzed or mitigated. The full edge effects of the project on the adjacent habitat need to be considered.

C-9 - poor description/analysis of landscaping plan
Page 11 of the MND says the landscaping will be "low water use plants such as native or drought tolerant species." Native plant species should be preferred and there needs to be restriction on the use of any species identified as potentially invasive. This is particularly important in an area like this adjacent to the creek. The Landscaping Plan is mentioned in the MND but was not included with the CEQA documents.

C-10 - fails to note if there is compliance with the CAP Checklist for tree canopy cover and impervious surface.
Per Figure 5a it appears that trees and landscaping will be impacted by the potential staging area along Pacific St on the southwest corner of the site. Yet the only restoration mentioned is hydroseeding of impacts to .5 acres of NNG. The MND needs to specifically identify any trees impacted by the project, specify replacement plans and ensure compliance with the CAP Checklist for Tree canopy Cover and percentage of impervious surface.

C-11 - No analysis of impacts of potential bird collision
The MND notes the project is within the migratory bird flyway yet fails to discuss potential collision impacts, especially those associated with the tower. Please discuss potential adverse impacts to migratory birds and associated mitigation.

C-12 - insufficient analysis of potential impacts of four bird species of concern
Appendix D to the Biological Resources Letter notes four special status bird species with moderate potential to occur because of the adjacent habitat along Loma Alta Creek. The MND makes passing mention of the Loma Alta restoration project currently under construction. This project will expand and enhance the habitat along the creek . The Project needs to do a better job of integration with the Loma Alta restoration plan and consider how project features along the biological buffer could adversely impact this restoration plan , or better yet- how the project site could actually enhance the benefits of this adjacent project.

C-7 The IS/MND prepared for the project includes Checklist subsection I, *Aesthetics*, which includes an analysis of visual changes associated with the proposed project from existing scenic vistas, including Buccaneer Park. Although the IS/MND did not include specific discussion of the Buccaneer Park Re-Visioning project, the proposed project would not conflict with this plan. As discussed in Checklist subsection I, visual changes resulting from the proposed project would involve aboveground components of the project, including the Buccaneer Lift Station, the public parking lot, bike/pedestrian path, walls/fencing, and landscaping improvements in the southern part of the LSWWTP site. Once landscaping is removed along Pacific Street to create driveways into and out of the proposed parking lot, eastern-facing views from Buccaneer Beach would change from views onto a landscaped and fenced area to views of a parking lot and pedestrian/bicycle path; however, western facing views of the Pacific Ocean would not be affected. New visual elements, such as the 24-foot-tall Buccaneer Lift Station with a potential 34-foot-tall tower, would be visible from Buccaneer Park. However, the resulting change from existing to proposed conditions would not be dramatic, as views of the project site would include a continuation of use of the site primarily as a public utility to continue to treat stormwater. No revisions are required.

C-8 The City recognizes that public use can result in indirect effects such as noise, litter, and unauthorized intrusion into habitat areas. As the comment notes, the project was specifically designed to incorporate a biological buffer adjacent to sensitive habitat areas associated with Loma Alta Creek. A new chain link fence would be provided between the path and the biological buffer and an existing chain link fence would remain between the biological buffer and Loma Alta Creek. The presence of the biological buffer and two chain link fences would restrict access into the adjacent biologically sensitive areas, and thus minimize potential indirect effects associated with public use, such as noise, trash, and intrusion by people and pets. Indirect effects from the parking lot and bike/pedestrian path during operations would therefore be less than significant. In response to this comment, the Final IS/MND has been revised to mention the fencing and to include discussion of potential indirect impacts from the parking lot and bike/pedestrian path during operations.

C-9 The landscaping plan has been prepared for the project and includes species of trees, shrubs, and groundcover that are native to California which would be planted adjacent to Loma Alta Creek to the southeast of the existing UV facility and proposed parking lot area. In accordance with the City of Oceanside

C-9 (cont.) Municipal Code (Section 37.122), no invasive plant species would be added to the landscaped area.

C-10 As the comment notes, existing landscaping would be removed along Pacific Street to create driveways into and out of the proposed parking lot; however, no trees would be removed by the project. As stated in response C-9 above, project landscaping includes species of trees, shrubs, and groundcover that are native to California which would be planted adjacent to Loma Alta Creek. As discussed in Checklist subsection X, *Hydrology and Water Quality*, there would be no substantial change in the area of impervious surfaces at the project site. No revisions are required.

C-11 The project does not include high-rise buildings, transmission towers, wind turbines, or other structures typically associated with elevated avian collision risk. Project structures would be of a scale and height consistent with utility infrastructure and other existing development in the surrounding area. Accordingly, the IS/MND did not identify bird collision hazards as a potentially significant impact. In addition, migratory birds are protected under the federal Migratory Bird Treaty Act (MBTA), which prohibits the unauthorized take of protected migratory bird species, including active nests, eggs, and nesting activities. The project would be required to comply with all applicable federal and state regulations protecting migratory birds, including avoidance of impacts to active nests through pre-construction surveys and seasonal avoidance measures identified in mitigation measures BIO-1 through BIO-3. Refer to Checklist subsection IV, *Biological Resources*, for additional information. No revisions are required.

C-12 The IS/MND considered special-status species with potential to occur in the vicinity of the project site in Checklist subsection IV, *Biological Resources*, of the IS/MND and the supporting Biological Resources Letter Report that was included as Appendix C. Refer to response C-11 for additional information. The commenter's recommendations regarding enhanced integration with the Loma Alta restoration project are noted; however, the proposed project was specifically designed to incorporate a biological buffer with Loma Alta Creek, and, as stated in Checklist subsection X.e, the proposed project would not conflict with the planned restoration of portions of Loma Alta Creek near the project site. This comment does not identify a deficiency in the environmental analysis contained in the IS/MND, and no revisions are required.

C-13

- fails to properly consider impacts to hardline preserve lands as identified in the SAP.
The analysis concludes "No conflict would occur" because the impacts are entirely within disturbed lands. However, it fails to consider numerous other provisions of the SAP related to hardline preserved lands. Lands along creeks are particularly important because of their use by wildlife. The SAP restricts development in hardline preserves and provides for future enhancement of these areas. For example, it assumes that 145 acres of land within the WCPZ will be restored to CSS, regardless of the actual current condition of the land. A 65 car asphalt parking lot is not without impacts and needs to consider all of the provisions related to hardline preserve lands . Furthermore this notes the adjacent critical habitat for CAGN directly adjacent to the project and for thread-leafed brodiaea within 100". It appears these critical habitat areas are also both within the designated hardline preserve and have not been properly considered.

C-14

GHG/Traffic Analysis
- improper GHG analysis
The analysis states there is no local threshold GHG threshold, yet in fact the city has been using an interim threshold identified in Planning Memo in the CAP Checklist. The GHG analysis assumes the project will have reduced GHG impacts, but fails to include the impacts of a 65 car parking lot. The VMT associated with these cars has not been considered. Furthermore this project should have completed the CAP Checklist and has not.

C-15

Water Quality
- fails to consider compliance with the Loma Alta Watershed Improvement Plan
The city adopted this sub-basin plan over 20 years ago and has very slowly been implementing the recommendation included in it. The MND states there is no water quality testing. There may be no recent testing along the project boundary, but there is on-going testing of this subwatershed. Its impairment is the reason that the improvement plan was undertaken to avoid an enforcement action by the Regional Water Quality Control Board for exceeding the limits for TMDL's. The MND needs to evaluate compliance with this adopted plan for Loma Alta.

C-16

- fails to consider impacts of parking lot in flood zone, and coastal zone
The MND shows a substantial part of the project site is within the Flood Zone- including the 65 car asphalt parking lot. While the storm water protection plan may protect the creek from regular run-off, it does not protect it from impacts associated with flooding. These impacts are increased from parking lots with their associated petrochemical pollutants both from the cars and from the asphalt used for paving.

Thank you for considering these comments.

Diane Nygaard
On Behalf of Preserve Calavera

C-13 The IS/MND evaluated the project's consistency with applicable North County Multiple Habitat Conservation Program (MHCP) Subarea Plan provisions, including the location of Hardline Preserve areas, adjacent critical habitat, and special-status biological resources. As described in the IS/MND and supporting Biological Resources Letter Report, all proposed project improvements would occur within previously developed and disturbed portions of the project site and would not result in direct impacts to preserved natural habitat within the Hardline Preserve. Additional discussion regarding the SAP that was provided in the Biological Resources Letter Report has been added to Checklist subsection IV.f in the Final IS/MND.

The commenter correctly notes that portions of the adjacent Loma Alta Creek corridor provide important wildlife habitat and that designated Hardline Preserve lands are intended to protect biological resources and facilitate habitat conservation and enhancement. For this reason, the biological analysis evaluated not only direct impacts within the project footprint but also the project's proximity to adjacent sensitive habitats, designated critical habitat for coastal California gnatcatcher, and nearby occurrences of thread-leaved brodiaea. The project was specifically designed to maintain a biological buffer adjacent to sensitive habitat areas and to avoid direct disturbance of preserved habitat lands. In addition, mitigation measures that would be implemented by the project include protection of biological buffers, construction-period restrictions, nesting bird protections.

C-14 The City acknowledges this comment regarding the project's greenhouse gas (GHG) emissions analysis. The comment states that the project should have used the interim threshold identified in the City's Climate Action Plan (CAP) Checklist. The CAP Checklist identifies a bright line threshold of significance for GHG emissions impacts of 900 metric tons of carbon dioxide equivalents (MT CO_2e) annually, with construction-related emissions amortized over 20 years. This significance threshold aligns with the City's emissions reduction targets outlined in the CAP of 3.5 MT CO_2e per service population. This 900-MT CO_2e threshold established by the City is consistent with the threshold used in the analysis included in Checklist subsection VIII.a of the IS/MND, which is based on the CAPCOA report, *CEQA & Climate Change.* The discussion in Checklist subsection VIII.a of the Final IS/MND has been revised to clarify that the City has identified this same 900-MT CO_2e threshold as the appropriate threshold for analysis of GHG emissions under CEQA.

C-14 (cont.) As stated in Checklist subsection VIII, *Greenhouse Gas Emissions*, of the IS/MND, fuel consumption associated with project operations would be anticipated to decrease as there would be no full-time employees at the site (compared to 10 to 12 daily employees at the LSWWTP site currently). The proposed construction of a public parking lot is not anticipated to generate additional vehicle trips, but would instead accommodate existing visitors to the area. As such, the parking lot component is not anticipated to generate operational GHG emissions. In addition, the construction of the parking lot was included in the GHG emissions modeling completed for the project, which is shown in Table 8, *Estimated Construction GHG Emissions*, of the IS/MND.

Lastly, the comment states that the project should have completed the CAP Checklist. However, as stated in the City of Oceanside CAP Checklist, applicants can choose to conduct project-specific GHG emissions analysis to demonstrate compliance with the City's significance threshold. As the project demonstrated compliance with the applicable significance threshold for GHG emissions in Checklist subsection VIII, the project is not required to complete the CAP Checklist. Further, as described in Checklist subsection VIII(b), the City's CAP states "General strategies for reducing energy use associated with the water and wastewater sectors include increasing the efficiencies of local water and wastewater treatment and distribution facilities, reducing reliance on imported water sources, and reducing overall water use." The project's proposed decommissioning of the LSWWTP and increased use of the SLRWRF would improve efficiencies of the municipal wastewater treatment facilities and would be consistent with the draft CAP.

C-15 As discussed in Checklist subsection X, *Hydrology and Water Quality*, of the IS/MND, the Carlsbad Watershed Management Area Water Quality Improvement Plan (WQIP) is the water quality control plan for Loma Alta Creek, which was developed to address impairment of the creek. The City enforces implementation of the Carlsbad Watershed Management Area WQIP, which identifies a total of 25 strategies to improve water quality. As stated in the IS/MND, the City has been monitoring water quality and conditions in Loma Alta Creek and is currently implementing a restoration plan for Loma Alta Creek. As concluded in Checklist subsection X of the IS/MND, the proposed project would not conflict with the Carlsbad Watershed Management Area WQIP, or the planned restoration of portions of Loma Alta Creek near the LSWWTP site. No revisions are required in response to this comment.

C-16 As stated in this comment, the proposed project, including the LSWWTP site and portions of the Buccaneer Force Main along Oceanside Boulevard and Garrison Street, is located within the 100-year flood zone and the 500-year flood zone, as established by FEMA. As discussed further in Checklist subsection X of the IS/MND, the proposed parking lot and bike/pedestrian path would continue to be located within FEMA flood zones. However, the project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) and permanent best management practices (BMPs) designed to minimize pollutant discharge from paved surfaces. The proposed parking lot would be designed in accordance with applicable floodplain and drainage requirements and would not substantially alter flood flows or increase flood hazards. Based on implementation of the required SWPPP and BMPs, the project would not result in a substantial degradation of water quality during storm events. No revisions are required in response to this comment.

From: Colleen Balch <mschief17@icloud.com>
Sent: Tuesday, July 7, 2026 2:58 PM
To: Robin Huber
Cc: Jonathan Borrego; City Council
Subject: proposed parking lot on north side of Loma Alta creek

D-1 Robin, I don't believe we have met yet. I cohost the South Oceanside Community and Merchants meetings with Richard Fox the founder. We have just been made aware that there is a proposed parking lot on the north side of the creek which is actually parkland that was deeded to the City at the same time as Buccaneer park was. Which means it is parkland and requires input and maybe a vote of the citizens of Oceanside to build.

D-2 We have held several meetings in the past two years to stay informed on the projects being proposed in and around Buccaneer Park. At one meeting held at Beach Break prior to Covid Nathan Mertz told us about a possibility of a parking lot on this land and was greeted with a resounding NO for many reasons. We have since had many more meeting with City Staff and consultant Jonathan Smith. This proposed parking lot was not mentioned in any to my recollection. That means no public input. However staff seems to have decided for the citizens of Oceanside that there needs to be a parking lot at that location.

D-3 For many reasons this is a very bad idea. Removing parking spaces from the east side of Pacific St. is against city standards. If someone other than staff proposed this it would have been denied. It appears that the removal of the spaces is to facilitate a driveway apron for ingress and egress of the proposed parking lot. That is a very dangerous spot to put the driveway. Many bikers and pedestrians use that area and having a driveway there means the possibility of someone being hit by a car. That area also has site limitations. There is already access to the property from Tait St. and Crosswaith St. Why do we need an additional driveway.

D-4 I understand 58 parking spaces are proposed. While we support a parking lot it doesn't need to be in this exact spot. The Coastal Commission wants parking in this area but this doesn't have to be the location.
This location is much better suited for an extension of Buccaneer Park. Since that is how it was deeded to the City we think it should remain that way. The parking lot can be moved farther east on the property and still meet the request of the Coastal Commission.

D-5 One area of major concern is the fact that it is proposed as an unrestricted parking lot. All that would do is facilitate more homeless camping in a neighborhood parking lot like is currently happening in the lot for Buccaneer. This is something that should be given a lot of thought to and how it would be monitored so no overnight camping is allowed.

D-6 Therefore since this project has not been given the proper input from the public we believe it should not go forward until the citizens of Oceanside have had a chance to give input on it.

Resectfully,
Colleen Balch
South O community and Merchants Co-chair.

D – Colleen Balch

D-1 The City acknowledges this introductory comment. The South Oceanside Community and Merchants are welcome to attend the public hearing in which community members are invited to provide input on the proposed project. This comment does not identify a deficiency in the environmental analysis contained in the IS/MND, and no revisions are required.

D-2 The City acknowledges this comment and that the South Oceanside Community and Merchants have expressed disapproval of the parking lot component of the proposed project. As stated in response D-1 above, community members are invited to provide input on the proposed project at the scheduled public hearing. This comment does not identify a deficiency in the environmental analysis contained in the IS/MND, and no revisions are required.

D-3 This comment has been noted by the City. As stated in the IS/MND, the project would involve the removal of approximately eight parking spaces along South Pacific Street. This would include the removal of approximately six spaces for ingress/egress, which would provide the City access to the site for ongoing maintenance of stormwater treatment and solid waste storage, as well as two spaces for access to the proposed bike/pedestrian path. As stated in the IS/MND, preliminary locations for ingress and egress for the proposed public parking lot along Pacific Street are shown on Figure 3 and have been reviewed by City staff for emergency access and safety, which included a sight distance analysis. Although the site is accessible via Tait Street and Crosswaithe Street, the existing Tait Street entrance is used exclusively by City of Oceanside Water Utilities staff to access the LSWWTP property and is not suited to serve the lift station. Accordingly, the City has determined that an additional driveway along Pacific Street is necessary to provide dedicated lift station access separate from this existing entrance. Specifically, two designated entrances are required along Pacific Street: one for the Public Works Department to perform trash collection, and one for City staff to access the lift station for operations and maintenance. Separating these functions improves operational efficiency by avoiding conflicts between service vehicles and LSWWTP staff traffic, enhances safety by keeping heavy equipment and maintenance activity off the shared Tait Street access point, and supports site security by limiting lift station access.

D-4 The City acknowledges this comment regarding the request to relocate the proposed parking lot farther east. This comment does not raise an issue concerning the environmental analysis or adequacy of the Draft IS/MND; no additional response is required.

D-5 The City acknowledges this comment regarding concerns about the unrestricted nature of the proposed parking lot. City of Oceanside Police Department (OPD) has prepared a Crime Prevention Through Environmental Design (CPTED) report. This analysis of the new site provides recommendations on how to reduce criminal activity through strategic site design, lighting, access control, visibility, and other environmental factors that can help deter crime and improve overall safety. The area that was evaluated extends from Crosswaithe Street to Morse Street, including Buccaneer Park, which has historical crime activity. Specifically, the CPTED report recommends that the proposed parking area includes security cameras and lighting to deter criminal activity and trespassing, which would be incorporated into final project design. This comment does not raise an issue concerning the environmental analysis or adequacy of the Draft IS/MND; no additional response is required.

D-6 The City acknowledges this conclusory comment. As stated in response D-1, community members are invited to provide input on the proposed project at the scheduled public hearing.

From: Shari Mackin <bzshari@gmail.com>
Sent: Friday, July 3, 2026 2:09 PM
To: Robin Huber
Cc: Jonathan Borrego; Shannon Vitale; Mabel Uyeda; Nathan Mertz
Subject: Re: Consultant for the LSWWP MND

Hi,

E-1 Question please...was Staff aware that should the 58 parking lots become kaput due to sea level rise, storm, flood, earthquake who knows what, that the City must replace 1:1 the parking west of the railroad tracks? I realize the 8 spots need to be replaced; however, is staff committed to find 50 more spots west of the tracks should we lose the proposed parking somehow? I believe there is room to replace the 8 parking spots close to the lift station, then plan for the other 50 within the coastal zone (consider along the railroad and other areas/lots between the railroad and Coast Hwy).

Thank you,

Shari

E – Shari Mackin

E-1 The City acknowledges this question and will continue to monitor the parking availability within this area and coordinate with the California Coastal Commission as needed should any physical changes or limitations arise in the future. This comment does not raise an issue concerning the environmental analysis or adequacy of the Draft IS/MND, and no further response is required.

1

7/6/2026

TO: Robin Huber

EMAIL: rhuber@oceansideca.org

Thank you for the opportunity to comment on the MND; please acknowledge recipe of my comments via return email.

Please find my Comments for the Buccaneer Lift Station and Force Main project at the La Salina Wastewater Treatment Plant.

F-1

For purposes of this submission, please note, when I speak of Buccaneer Beach Park, I am speaking of the ENTIRE 5-acre Buccaneer Beach Park (both sides of the creek) which includes in part: the UV treatment plant, current parking lot, the coastal bluffs, and additional property that is currently used by the La Salina Plant and Maintenance Yard per "updated" City Real Property Inventory Report of 8/29/2005.

Shari Mackin

bzshari@gmail.com

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F – Shari Mackin

F-1 The City acknowledges this introductory comment.

2

I. AESTHETICS

A) The sitting of a parking lot will have a substantial adverse effect on the scenic vista of coastal areas.

Section 30251 of the Coastal Act shares, "...the scenic and visual qualities of coastal areas are legally protected as resources of public importance." Should the proposed parking lot be sited at the Loma Alta Creek and Pacific St., it will have substantial adverse effects to the visual qualities of this coastal area now, and *especially* after Buccaneer Beach Park is remolded when the view corridor of the coastal areas will be enhanced.

F-2 This is the current view from the beginning/end (depending which way you travel) of the Loma Alta Creek Walking Path looking north to the slough. Please note this area will look much different once the park is remodeled. The maintenance building and current plants will be gone, but the trees will remain. The current scenic view will open up exponentially; therefore, much thought should go into using the coastal bluffs to enhance the coastal area and frame the view of the slough to carry the current open feeling/space of Buccaneer Beach Park into this area.



F-2 The City acknowledges this comment regarding visual character and scenic views. Potential project impacts related to aesthetics were evaluated in Checklist subsection I, *Aesthetics*, of the IS/MND. The project site is located within an existing developed public utility facility that currently contains wastewater treatment infrastructure, paved areas, fencing, utility features, and parking. As discussed in Section I.a, the proposed public parking lot, bike/pedestrian path, landscaping improvements, and architectural treatment of the lift station would alter views from portions of Buccaneer Park and Buccaneer Beach; however, the project would not substantially obstruct or degrade identified scenic vistas. Ocean views would remain available, and the project would incorporate landscaping and site improvements that are consistent with the developed character of the site. Based on the analysis contained in the IS/MND, impacts to scenic vistas and visual character would be less than significant. No revisions to the IS/MND are required in response to this comment.

3

The following pictures were taken just east of the previous picture on the Loma Alta Creek Walking Path as the slough and estuary restoration is underway.





F-2 cont.

4

F-2 cont.

Behind the shrubs and trees (to the left) in the westerly background are coastal bluffs hidden by over grown shrubs and bush.



The Loma Alta Walking Path is a popular feature shared in the City of Oceanside's Parks and Recreation Master Plan (pg. 18) and shown below is a picture of part of the walking path, west of the railroad where people connect to the park and beach from Coast Hwy., senior mobile home park, or neighboring RV Park (lower cost visitor serving accommodations).

5

F-2 cont.



The path is very popular and a place where people stop to look at the creek. reeds (estuary) and just take in open space in the coastal area. It's peaceful, passive and an enjoyable coastal experience. When planning the restoration and subsequent bike and walking path on the north side, deep thought/study should take place of how the eye travels, how to draw the eye, and what would be the best backdrop of the space by the slough to enhance the coastal aera. A parking lot currently sits on the Buccaneer Beach Park open space. The scenic coastal bluffs bring the history of the creek and area to life and will enhance the visual qualities that we currently enjoy at that site. A paved parking lot will take away from this important scenic coastal area. There should be consideration of planting coastal dunes as they frequently pair with coastal bluffs and estuaries in California, creating unique, dynamic landforms, and crucial habitats. We need to think of what was here and restoration to enhance the current coastal

F-2 cont.

visual experience. Even the Oceanside Chamber of Commerce has been advertising the Buccaneer Beach Park Revision Plan "...a Loma Alta Creek deck and boardwalk overlook..." on their website as many are very excited about the plan for the entire area. Let's take the opportunity to be creative and enhance the current scenic view on that location and consider other options for parking.

Buccaneer Beach Park (north) should be left for passive uses that complement the creek, estuary, and slough restoration as well as the park (south). Enhance the current scenic and visual qualities of the coastal areas thought visually responsive design, i.e.: landscaping (native plants and trees) complementing the creek and view across it. See Google View below:





F-3

Below is one of the subsequent projects previously mentioned in progress as the city has requested Federal Funding for the project. Please see the "Park Concept" below (generated after outreach was conducted and analyzed) showing features/areas: 1 (fixed seating), 7 (Loma Alta Creek Deck & Boardwalk Overlook Over Bio-Basin), and 9 (Lawn Picnic Area). All features that were high on the "want" list for the passive park, in the open space designation – please read some comments and view the process and plans here. The survey was city wide, offered online as well as in-person workshops at Buccaneer Beach Park, community meetings and Famers Market.



As you can clearly see, from features 1, 7 and 9, all eyes will be set on the restoration to the north, especially the slough and estuary are for features 1, 7 and 9. People do not go to parks to view parking lots - this area should be protected from parking lot blight per the Coastal Act. Many of us have familiarized the Parks and Recreation Commission, residents in the neighborhood as well as Oceanside residents online that the rest of Buccaneer Beach Park lies across the creek.

F-3 The City acknowledges the commenter's preference for alternative parking locations. CEQA requires evaluation of a project's environmental impacts but does not require an alternatives analysis when a project's impacts can be mitigated to a less-than-significant level through a MND. The IS/MND evaluates the environmental effects of the proposed project, including the public parking lot. As discussed in Checklist subsection I, *Aesthetics*, Checklist subsection XI, *Land Use and Planning*, and Checklist subsection XVI, *Recreation*, the addition of public parking would not result in significant impacts to visual resources, land use, or recreation. This comment does not warrant revisions to the IS/MND. The comment expresses a preference regarding project design and parking location, which has been noted for consideration by City decision-makers.

As described in the Buccaneer Park Re-Visioning Project materials, this separate City planning effort was developed through multiple public workshops and surveys and is intended to provide improvements to Buccaneer Park, including redesigned park amenities, improved connections to the Coastal Rail Trail, and responsiveness to the adjacent Loma Alta Slough restoration project. The Buccaneer Park Re-Visioning Project primarily addresses improvements within Buccaneer Park south of Loma Alta Creek, whereas the proposed project that is analyzed in this IS/MND is located within the former LSWWTP site and is intended to support wastewater infrastructure needs, public access, and replacement parking. The City considered both the existing and planned recreational character of the surrounding area in developing the proposed project.

The proposed parking lot is a component of the proposed project that the Draft IS/MND analyzed. The MND was circulated for a 30-day public review period beginning on June 8, 2026, and ending on July 8, 2026, during which comments from the public were received. This comment does not include new information that would require revisions to the IS/MND, and no further response is required.

7

As stated, the building to the right will be removed and therefore offering only more of the scenic vista once the park is remodeled. Thus far, the thought of additional open space and view protection is paramount to residents. The park plan will enhance the south side of the park with fixed seating (picnic), bike racks and the Loma Alta Creek Deck & Boardwalk Overlook Bio-Basin all facing that area.

Just imagine, should the proposed parking lot be built, instead of seeing coastal bluffs in the background, you will see a parking lot (large Sprinter Vans, Campers, and other vehicles). Residents have not had the opportunity to comment on the parking lot proposal. Where was the outreach for our park planning?

F-3 cont.

Why has the city proposed to make this area a parking lot? There are other options for parking available that won't have an adverse effect on the scenic vista. Please see the areas highlighted in yellow below. According to Resilient Wetlands, the city is in negotiations with owners of a couple of the properties circled on the east side of the railroad tracks - this would be a great place to park. It would allow access for visitors from Coast Hwy without impacting the current scenic vista and soon to be improved scenic vista.



The one-for-one 8 parking spaces could be accommodated in front of Lift Station with little to no impact to the scenic vista, and the remainer of the parking, east of the railroad, on railroad property or soon to be acquired city property. Again, a parking lot east of the railroad will not impact the scenic vista at this location (especially if located on transit property).

F-4

To add, Staff should always look for partnerships with NCTD for any additional parking needed – often, they have sites in their right of way that would serve the public well for use. Finally, the city successfully negotiated with the railroad/NCTD to use the highlighted space for parking in the railroad right-of-way (see picture below). They have also worked with NCTD to use the property on the easterly side of the railroad tracks at Morse and Broadway St. to Eaton for additional parking and a linear park to support the completion of the Coastal Rail Trail. It can be accomplished!

F-4 The comment recommends alternative parking opportunities and potential partnerships with the North County Transit District (NCTD). The comment does not identify a deficiency in the environmental analysis contained in the IS/MND, and no revisions to the IS/MND are required. However, the City has noted this comment and will continue to coordinate with relevant agencies, including NCTD, as applicable for future City projects.

8



Example of working with NCTD/Railroad for parking opportunities

F-5

B) According to the MND, the author writes, "Permanent visual changes would involve above ground components of the project, including the Buccaneer Lift Station, the public parking lot, bike/pedestrian path, walls/fencing, and landscaping improvements in the southern part of the LSWWTP site. Therefore, the potential for permanent visual impacts would be limited to Buccaneer Beach and Buccaneer Park". (pg 16) Hopefully, the city is looking into landscaping natives to the area and trees as to soften the "public works" look.

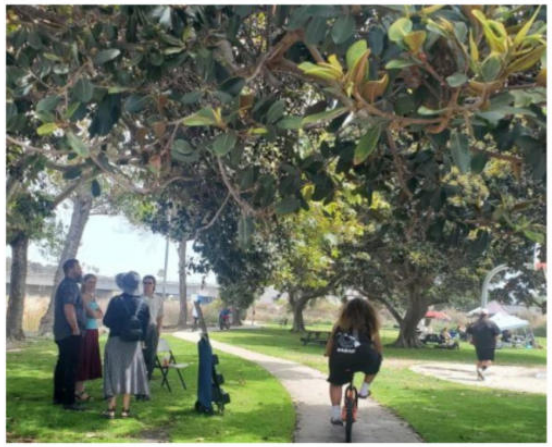
Section 30251 of the Coastal Act shares, "...the scenic and visual qualities of coastal areas are legally protected as resources of public importance." Should the proposed parking lot be sited at the Loma Alta Creek and Pacific St., it would have substantial adverse effects to the visual qualities of this coastal area.

Please refer to comments in "Section A", to (B). In addition, the Loma Alta Footpath that is south of and adjacent to the Loma Alta Creek is a scenic path that takes people from Coast Hwy to the Beach. It is widely used by people walking with children, dogs, and some, riding bikes - they enjoy the visual qualities of the creek and greenspace backdrop of the Neighborhood Park: Buccaneer Beach Park. Siting a parking lot to replace what is currently green open space is inconsistent with the Coastal Act considering there are other options for parking available such as the outskirts of the lots for the restoration project), or by requesting a railroad easement/use agreement. By doing so, you will be freeing up more open space to the public for use; therefore, retaining the scenic and visual qualities of coastal areas at the creek.

F-5 The landscaping plan that has been prepared for the proposed project includes California native species of groundcover, shrubs, and trees. As described in responses F-2 and F-3 above, the IS/MND analyzes visual impacts in Checklist subsection I, *Aesthetics*, and concludes that the project would not block public ocean views, substantially degrade scenic resources, or create significant visual impacts. In addition, consistency with the City's Local Coastal Program was evaluated in Checklist subsection XI, *Land Use and Planning*, which concluded that the project would comply with the LCP land use plan provisions and that no conflicts would occur. Please refer to Checklist subsection XI.b of the IS/MND for additional details of this consistency analysis. This comment does not provide substantial evidence that the project would result in a significant aesthetic impact beyond those evaluated in the IS/MND, and no revisions are required.

9

F-5 cont.



Public Views: Permitted development must be sited and designed to protect public views to and along the ocean and other scenic areas (Section 30251). The Loma Alta Creek is considered a "scenic area" and within Coastal jurisdiction. It is green space visually enjoyed by the public when they visit Buccaneer Beach Park. The Loma Alta Footpath is widely used and runs adjacent to the Loma Alta Creek. Any day of the week you can find people walking the path, stopping to enjoy the view across the creek. The green space should not be replaced with a parking lot; a parking lot is visual blight. It should be sited away from the creek. Once the creek is restored, the area should be returned to its natural space for people to enjoy without the "possible permanent impacts" to the area as described in the MND.

Visual Compatibility: New developments must be visually compatible with the character of surrounding coastal areas. Once restored, the northern side of the creek will be lined with plants and a trail. A parking lot should not be considered visually compatible with the restoration; however passive recreation and green open space would be.

Additionally, although the Coastal Act mandates maximum public access and recreational opportunities along the coast, moving parking to the other side of the railroad tracks would not impede access; rather enhance it. Pacific Street on any given weekend is super impacted with visitors to the beach or merely driving the coast via auto, bike, or walking. The Coast Hwy would be a great way to enter the restoration area and either visit the beach or park or simply hop on the bridge to get on the Coastal Rail Trail or head east on the Inland Rail Trail.

VII. GEOLOGY AND SOILS

F-6

F) I've had a chance to peek through the chain link fence on South Pacific Street where I saw coastal bluffs near the creek. Coastal bluffs are unique geological features and should be protected. There are significant concerns about the bluffs being disturbed whether directly or indirectly; if disturbed, that could jeopardize the ability to create a transition zone, something

F-6 As discussed further in Checklist subsection VII, *Geology and Soils*, of the IS/MND, the proposed project would occur within previously disturbed portions of the former LSWWTP site and would be designed and constructed in accordance with applicable geotechnical recommendations, engineering standards, grading requirements, and building code provisions. Based on the Geotechnical Exploration Report prepared for the project (refer to Appendix A of the IS/MND),

F-6 cont.

that can host exceptional ecological biodiversity. I believe the proposed parking lot is within 50 ft. of the coastal bluffs located on the westerly side of the property by the slough; therefore, the bluffs must be protected. Consider moving any parking to one of the properties the city will be acquiring in the area east of the railroad tracks or along the railroad tracks.

According to Resilient Wetlands, "The project area is approximately 6.8 acres, which includes 5.8 acres of City-owned property and an additional 1-acre parcel that the City plans to acquire in a future phase of the project. The Project design will consider removing fill and restoring wetlands where possible, which will allow for expansion of the existing stream channel and/or restoration of historic wetland habitats."

F-6 (cont.) the project would not result in unstable soil conditions, landslides, substantial erosion, or other geologic hazards that could adversely affect nearby landforms, including the coastal bluffs. Accordingly, the IS/MND concluded that geology and soils impacts would be less than significant. In addition, the IS/MND evaluated potential impacts to biological resources in subsection IV, *Biological Resources*, and determined that the project would not result in significant impacts to sensitive habitats or wetlands with implementation of the identified mitigation measures. No revisions to the IS/MND are required in response to this comment.

XI. LAND USE AND PLANNING

LCP Land Use Plan

Section 1 – Coastal Access

Summary of Major Findings

F-7

Major Finding 7. The shoreline between Wisconsin and Witherby Streets is accessed by five 80-foot wide public "pocket" beaches, Spaced at 450-foot intervals.

Objective. Adequate access to and along the coast shall be provided and maintained.

Response: The 8 "pocket" beaches/access between Wisconsin and Witherby Streets are not assessable due to erosion, high and King tides as well as exposed riprap. The beach accessways are no longer maintained. Buccaneer Beach Park beach has shrunken more than I've seen in the last 50 years of living in South Oceanside. To date, the area where sand has been deposited on top of cobble "beach" is at least 1/2 the size it was when my children used the beach. It was a great surfing favorite break and now, the waves are breaking far too close to the shore to surf. The break has changed and it is rare to see someone surfing at "Buc" beach anymore. South Oceanside's beaches have not been nourished for approximately the past 20 years; Oceanside let their first SCOOP permit expire sometime around 2007, and not until recently did the city reapply for the permits. Rather left our beaches erode, succumb to the ocean. "Buc" beach has taken severe hits during both high and King tides, as well as big swells. There is no beach access from Wisconsin Street to the Buena Vista Lagoon with the exception of the small patches of sand placed on top of beach cobble close to Pacific Street at "Buc" beach. There is a parking lot at Buccaneer Beach Park that has 65 parking spaces. Beach access is very limited in South Oceanside due to current conditions from armoring, erosion, King Tides, large swells, and lack of sand nourishment over the years.

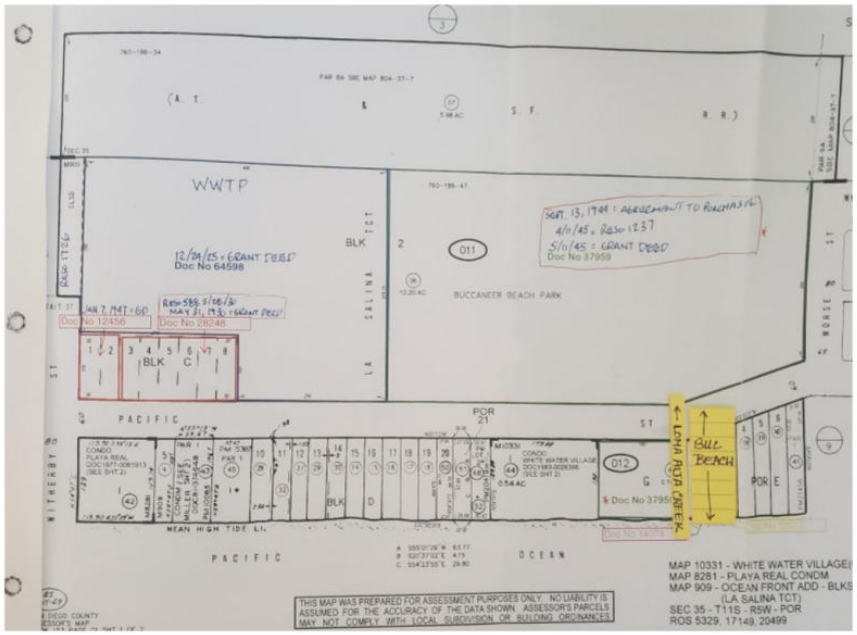
F-7 The City acknowledges the commenter's concerns regarding land ownership, Assessor's Parcel Number (APN) consolidation, open space, and coastal access. Questions regarding property ownership history, parcel consolidation, and previous administrative actions do not constitute environmental impacts under CEQA, and no revisions to the IS/MND are required. However, to provide the commenter with additional clarification, the City Surveyor and Property Management team reviewed the title history to confirm or rule out the restriction. City Council Resolution 81-47, passed in 1981, designated parkland as only the area south of La Salina Lagoon (present-day Loma Alta Creek). This resolution only designated the land south of the La Salina Lagoon as park land. The land to the north of the lagoon that is part of the original deed parcel is not designated as park land. Additionally, the 1986 Zoning Ordinance established the zoning in this area as Public Utilities.

11

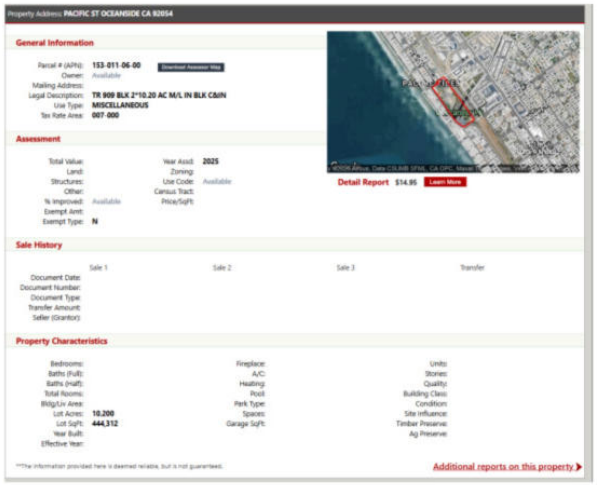
Consistency Discussion –

Response: The site where the parking lot is proposed is part of dedicated Buccaneer Beach Park property. Please see the County Assessor's Map with a workup of documents associated with the gift/purchase of the property for Buccaneer Beach Park and the La Salina Waste Water Facilities. Please note shows property lines as such:

F-7 cont.



F-7 cont.



Several APN's have been combined (waiting to hear from the City of Oceanside's Property Management Division – public records request), not sure if the Coastal Commission has records of this, but now, the entire property lies under one APN now. Regardless, that does not change the fact that the ENTIRE park property has always been zoned OS – open space. Why were all property consolidated into one APN number? Was the Coastal Commission consulted? Was the action Oceanside City Council approved?

The graphic below outlined in red depicts how much of the La Salina Plan is "on" Buccaneer Beach Park and designated OS – open space:



Coastal Act Section 30212.5. "Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the

impacts, social and otherwise, of overcrowding or overuse by the public of any single area." (Added by Stats. 1976, Ch. 1330.) Government agencies such as the City and Coastal Commission are required to spread out public amenities and parking lots across the region (city) rather than concentrating them in one area.

A parking lot is proposed across the creek from the current 65 space parking lot on the southern portion of Buccaneer Beach Park. That is not considered "distributing throughout an area". How could one possibly think it is? Coastal Act Section 30212.5's goal is to prevent such things as "over-tourism", environmental degradation, and lastly, traffic congestion in any popular destination or single neighborhood. Siting a parking lot with equal amount of parking as the current parking lot across the creek is intentionally oversaturating the area. Combined, that would be 130 (not including the 8 1-1 required parking replacement) parking spaces taking up approximately 1 – 1.5 ACRES of open space in a city designated passive Neighborhood Park on OS zoned land. The addition of that lot will overload our current and future recreational areas!

F-7 cont.

Best practice should be to find smaller areas for parking (think Witherby area, adjacent to the railroad line, etc.), spread the load with shuttle services such as GoOside, a program partially funded by SANDAG and look for other means to move people. QR Codes could be provided at transit station (one in South O) to help shuttle people to the beach at no charge. Finally, and very important is protecting quality or life for residents in the vicinity and protecting nature. Once the creek is restored, we hope for the return of many birds to the estuary and slough. A parking lot is not conducive to protecting nature. Whether that be by pollution stemming from a parking lot or oversaturation of the area by humans, it is simply not a good mix.

Section II – Recreation and Visitor Serving Facilities

The Coastal Act requires adequate distribution of public faculties such as parking areas, provision of lower cost visitor facilities, protection of oceanfront areas for coastal recreation, granting of priority to commercial recreation uses, reservation of upland areas to support coast recreation, and distribution of visitor facilities though out the Coastal Zone.

Summary of Major Findings

F-8

Policy 12. If existing beach parking is removed for any reason, one-to-one replacement parking shall be provided west of the railroad right-of-way.

Policy 13. Efforts shall be made to provide additional public beach parking facilities to serve anticipated future demand. Priority should be given for new parking facilities to serve the following locations:

b. The beach area between Wisconsin and Witherby Streets

Policy 23. All beach parking lots shall be clearly signed and identified for public use.

F-8 The City acknowledges this comment. As concluded in Checklist subsection XI.b, the project would comply with the LCP land use plan provisions. The proposed parking lot would be located approximately 400 feet southeast of Witherby Street, and it is therefore reasonable to assume that this parking lot would accommodate visitors to this area identified in the LCP land use plan. The comment primarily raises a policy interpretation issue rather than identifying a new environmental impact, and therefore no revisions to the IS/MND are required. However, the City has noted this comment and the preference for smaller parking areas throughout this location.

Consistency Discussion

Response: In my beach going mind, the proposed parking lot is not consistent with our LCP as the LCP states, priority for new parking would serve "the beach area between Wisconsin and Witherby Streets". The proposed parking lot is quite a distance from that needy section. I have hard time thinking that people would park all the way from the proposed lot (blue parking spot) and walk up to any beach access (when Buccaneer is right there) to get to a pocket beach within the yellow highlighted area. I don't believe it meets the criteria; it is quite a walk up the hill to look for a pocket beach in the highlighted area. Makes much more sense to provide smaller areas (like the parking on Witherby across from the beach) throughout the needy area then what is proposed.



F-8 cont.

Section III – Water and Marine Resources: Summary of Major Findings

Summary of Major Findings

Major Finding 14. There are three flood prone aeras in Oceanside's coastal zone: The San Luis Rey River, Loma Alta Cree, and the Buena Vista Lagoon.

Major Finding 16. Land within the Loma Alta Creek 100-year flood plain is largely developed. Uses which have been built in the floodplain include two mobile home parks, one of the City's sewage treatment plants, and a number of industrial and commercial buildings. These uses are subject to inundation during peak storm conditions.

F-9

Objectives and Policies

Objective. The City shall work with the Regional water Quality Control Board and other appropriate agencies to prevent degradation of Oceanside's Coastal water.

Policy 2. As part of its environmental review process, the City shall establish measures on a project-by-project basis to minimize the introduction of dissolved grease, oil, paints, pesticides, construction and other pollutants into the urban runoff.

Consistency Discussion

F-9 Potential project impacts related to hydrology and water quality were evaluated in Checklist subsection X, *Hydrology and Water Quality*, of the IS/MND. The project would include drainage improvements, stormwater management measures, and compliance with applicable stormwater regulations, including preparation and implementation of a SWPPP. Construction of the project, including the proposed parking lot, would incorporate BMPs intended to maintain appropriate flood conveyance and reduce runoff impacts, including, but not limited to, grading restrictions for applicable areas during wet weather; use of erosion control/stabilizing measures such as geotextiles, mats, fiber rolls, hydroseeding, or soil binders; and compliance with local dust control measures. Once operational, drainage in the project area would function as it does under existing conditions as grading and site preparation in the southern part of the LSWWTP site would generally maintain existing elevations and the site would be balanced and the concrete gutters proposed along Pacific Street adjacent to the proposed parking lot would temporarily collect runoff during rain events before draining towards Loma Alta Creek, as occurs under existing conditions. The IS/MND concluded that impacts related to flooding, drainage, water quality, and hydrology would be less than significant.

Response:

Since the current parking lot in is the flood-prone area, we should not reproduce that mistake by building yet another. Building a traditional, impermeable parking lot in a flood-prone area generally decreases coastal resilience. This type of parking lot creates large runoff volumes, worsen flood intensity, and destroy natural habitats.

With direct reference to the proposed parking lot and flooding:

F-8 cont.

- How does the proposed parking lot align with coastal resilience goals/policy?
- How does the project, building a parking lot on site minimize energy consumption and vehicle miles traveled?
- How does the project protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses?
- How does the project take into account the effects of sea level rise in coastal resources planning and management policies and activities in order to identify, assess, and, to the extent feasible, avoid and mitigate the adverse effects of sea level rise?

Section VI – Visual Resources and Special Communities

The Coastal Act requires that the visual qualities of the Coastal Zone shall be protected, and that new development be sited and designed to be visually compatible with the character of surrounding areas.

Policy 3. All new development shall be designed in a manner which minimizes disruption of natural land forms and significant vegetation.

Policy 11. The City shall encourage variety, creativity, and site-responsive design for all new development.

F-10

Policy 13. New Development shall utilize optimum landscaping to achieve the following effects: (a) accent and enhance desirable site characteristics and architectural features; (b) soften, shade and screen parking and **other problem areas**; (c) frame and accent (but not obscure) coastal views; (d) create a sense of spaciousness, where appropriate; and in areas where significant natural vegetation exists, replant, as appropriate, developed areas with native drought-tolerant species.

Consistency Discussion

Response: The report states that "…these components would not result in disruption of natural landforms or vegetations at the site". Will the landforms (coastal bluffs) be part of a bluff restoration project? Currently, some of them have grass or weeds growing on them. What does

F-9 (cont.) In addition, the proposed parking area is intended to support coastal access and recreational uses already served by the site; therefore, it would not be expected to increase vehicle trips beyond those analyzed in the IS/MND in a manner that would create a significant transportation or energy consumption impact. Refer to Checklist subsections VI, *Energy*, and XVII, *Transportation*, for additional information. Further, the project maintains and improves public access to coastal recreational resources and would not adversely affect the use of surrounding neighborhoods as visitor destinations. With respect to sea-level rise, the project was analyzed in this IS/MND in the context of flood hazards, coastal conditions, LCP consistency, and FEMA requirements, and the IS/MND did not identify a significant impact.

The comment does not provide substantial evidence that the project would result in significant hydrology or water quality impacts beyond those disclosed in the IS/MND, and no revisions are required.

F-10 The City acknowledges the comment. As discussed in subsection I, *Aesthetics*, the project would include landscaping, fencing, and other site improvements intended to improve the appearance of the site while accommodating necessary public infrastructure and public access improvements. The IS/MND evaluated views from adjacent public areas, including Buccaneer Beach Park. While the proposed parking area may be visible from portions of the park, landscaping and site design features would reduce visual contrast and the project would not substantially impair the public's enjoyment of the surrounding recreational amenities, including the overlook, seating, and lawn areas identified in the Buccaneer Park Re-Visioning Project. The proposed project site is located east of Pacific Street and is not located along the coastal bluffs and therefore would not involve restoration of these coastal bluffs. However, as discussed in Checklist subsection VII, *Geology and Soils*, of the IS/MND, the project would not significantly alter or destabilize existing landforms, including the coastal bluffs. This comment does not identify an environmental impact that was not previously disclosed in the IS/MND, and no revisions are required.

F-10 cont.

the city have planned for the coastal bluffs? How has the city "encouraged variety, creativity, and site-responsive design" for the parking lot (see ASTETHICS pgs. 2-7 above)?

How has the city framed and accented design ideas for the view of the parking lot from south Buccaneer Beach Park? How was the parking area designed to seamlessly blend into a natural setting and protect scenic coastal public coastal views of the south side of the creek so it harmonizes with character of the surrounding creek and south park area? Did the city take into consideration the rigorous park planning process which has occurred for the Buccaneer Beach and Park (south) plans here? How will a parking lot complement the south Buccaneer Beach and Park plans – especially features 1, 7 and 9?

How has the city accented and enhanced desirable site characteristics such as the coastal bluffs into its plan? The parking lot (cars, Sprinter vans, campers, and other vehicles) will be highly visible from the from the proposed viewing vantage points in the Buccaneer Beach Park Re-Visioning Plan, especially features 1, 7 and 9. Taking the Buccaneer Beach Park Revisioning Plan into consideration how can the city screen the "problem area" ie: parking lot, from those coastal scenic vantage points?

F-11

Section VII – New Development and Public Works

The Coastal Act requires mitigation of impacts to archaeological and paleontological resources, the location of new development in or near existing urban area, improvement of transit and parking opportunities, and provision of on-site recreation facilitates. The Coastal Act also limits new and expanded public works for facilities to those facilities necessary to accommodate new development or uses permitted by the Act.

Summary of Major Findings

Major Finding 6. In the South Pacific Street Beach area:

(a) Any residual land not needed for the La Salina Treatment Plant should be considered for public use.
(b) Provision of adequate on-site parking for new development is particularly critical because of existing deficiencies in on-street parking.

Consistency Discussion

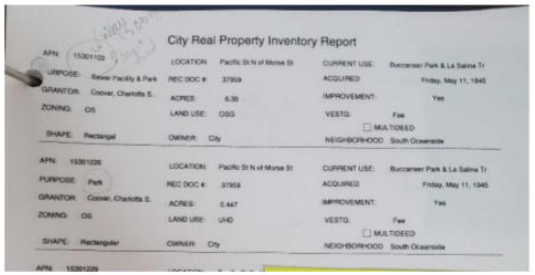
Response:

Regarding (a) "residual land", on June 19 2026, I submitted a public records request regarding Buccaneer Beach Park "NORTH" - the property north of the Loma Alta Creek, as show on the Assessors Map. The records request is as follows:

F-11 This comment is noted. As stated in response F-3 above, the Draft IS/MND was circulated for a 30-day public review period, during which comments from the public were received on the proposed project, which includes the parking area. Questions regarding future land use preferences, property management decisions, outreach efforts, and planning priorities are policy matters and do not, in themselves, constitute environmental impacts under CEQA. No revisions to the IS/MND are required.

17

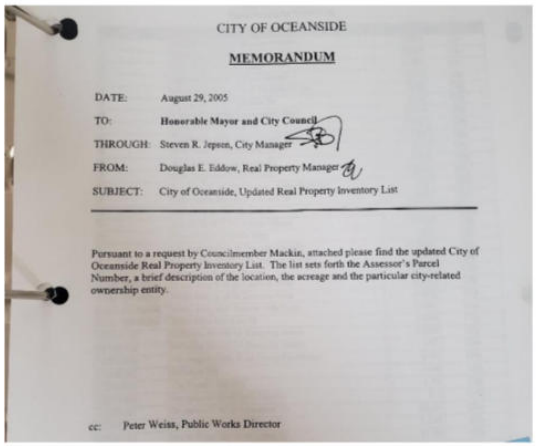
F-11 cont.



City Real Property Inventory Report

APN: 15301103 LOCATION: Pacific St N of Morse St CURRENT USE: Buccaneer Park & La Salina Tr
PURPOSE: Sewer Facility & Park REC DOC #: 37959 ACQUIRED: Friday, May 11, 1945
GRANTOR: Coover, Charlotte S. ACRES: 6.38 IMPROVEMENT: Yes
ZONING: OS LAND USE: OSG VESTG: Fee
SHAPE: Rectangul OWNER: City MULTIDEED
NEIGHBORHOOD: South Oceanside

APN: 15301026 LOCATION: Pacific St N of Morse St CURRENT USE: Buccaneer Park & La Salina Tr
PURPOSE: Park REC DOC #: 37959 ACQUIRED: Friday, May 11, 1945
GRANTOR: Coover, Charlotte S. ACRES: 0.447 IMPROVEMENT: Yes
ZONING: OS LAND USE: UHD VESTG: Fee
SHAPE: Rectangular OWNER: City MULTIDEED
NEIGHBORHOOD: South Oceanside



CITY OF OCEANSIDE

MEMORANDUM

DATE: August 29, 2005

TO: **Honorable Mayor and City Council**

THROUGH: Steven R. Jepsen, City Manager

FROM: Douglas E. Eddow, Real Property Manager

SUBJECT: City of Oceanside, Updated Real Property Inventory List

Pursuant to a request by Councilmember Mackin, attached please find the updated City of Oceanside Real Property Inventory List. The list sets forth the Assessor's Parcel Number, a brief description of the location, the acreage and the particular city-related ownership entity.

cc: Peter Weiss, Public Works Director

I would like to know what happened to the above referenced APN Numbers...

- Was it incorporated into another lot? If so, when?
- What is the current use?
- Did the city council take action?
- Was the Coastal Commission advised?
- Was it approved by the Coastal Commission?
- What is its current use?

The only answer I received was the APN's were all incorporated into one APN for all the property. I have known about the parkland (north side of the creek) and the provision in our LCP cited above: Major Finding 6 (a) above for many years and have been very vocal about it as mentioned earlier on. I've let the community know that there is more to Buccaneer Beach Park than what they merely currently see. The City Council knows how important expansion of the park is to the community, as the community has been before them several times along with the Parks and Recreation Commission requesting public meetings/planning sessions for when the La Salina Plant is decommissioned. We have NOT been offered public meetings/planning to discuss Buccaneer Beach Park NORTH. In fact, the decommission has quietly happened and not until the parking lot proposal became public, did we know that the area had already been planned by public works - effectively shutting the community out and pigeonholing the park property as a parking lot. There was one presentation made at the South O Merchants and Community Meeting a few years ago where Staff did share the "idea" of siting a parking lot adjacent to the creek and it was a strong "NO" from all who attended. No one had heard anything else about it until the MND went online.

F-11 cont.

All this concerns me deeply. I am concerned that the Coastal Commission isn't aware of the changes made to the entire property (one APN), were they even notified? The Coastal Commission likes to see robust outreach and lots of public comment, such as what happened with the Buc Revisioning Plan. That most certainly did not happen here. This project (parking lot) should not be approved due to the lack of public input. I realize parking is priority with the Coastal Commission/Act; however, I've cited alternatives for proposed parking lot. This property means a lot to the South O Community as it continues to densify. Open space is necessary for the public good, mental and physical health. There are other parking places that will be opening up with the completion of the rail trail from Oceanside Blvd. to Eaton Street. For example, the city has acquired the use of NCTD property along Broadway and parallel street parking has been suggested which would bring a lot of parking just east of the tracks and will directly access the rail trail.

The city needs to get in front of the public and have a discussion about the use of the residents of Oceanside's dedicated parkland. Important to remember: 30212.5. "Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area." 130 parking spaces at Buccaneer Beach Park will result in overcrowding/overuse.

Regarding the following documents:

A – current County Assessors Map

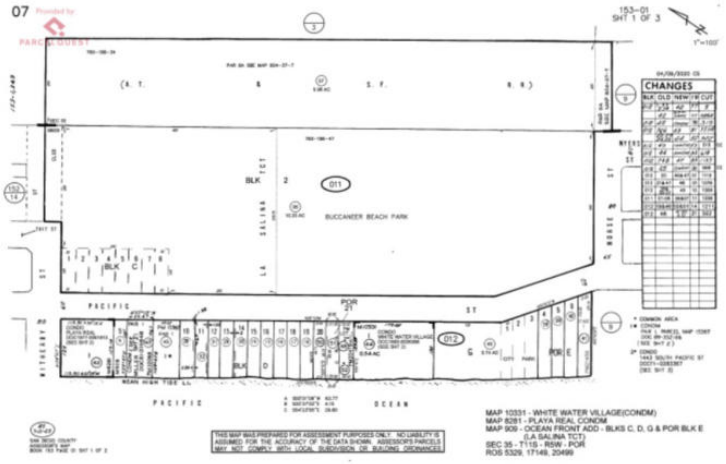
19

B – Map including resolutions etc. that are connected to the property

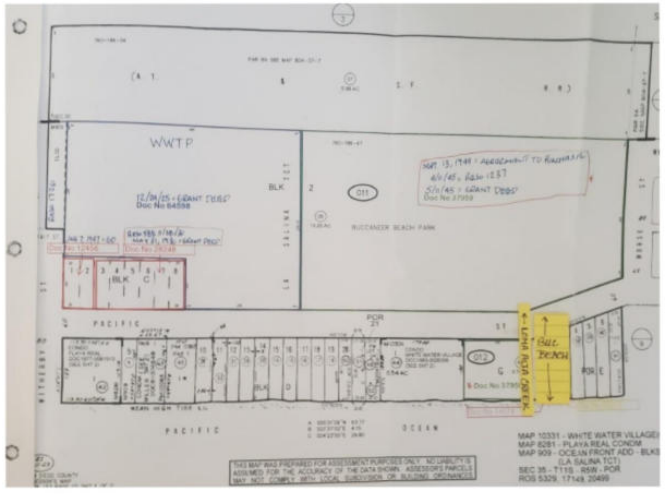
C – Graphic depicting (red outlined box) how much of the La Salina Plant is sited on Buccaneer Beach Park (north) dedicated parkland, designated OS – open space:

F-11 cont.

A:



B:



20

C:



F-11 cont.

Regarding (b): "Provision of adequate on-site parking for new development is particularly critical because of existing deficiencies in on-street parking." One must know that once the trail is complete, any bicyclist can park anywhere along the trail to gain access! Remember the Oceanside segment for the Coastal Rail Trail will complete the long-awaited connection to Carlsbad and/or the harbor. Again, parking is being proposed for the completion of the Coastal Rail Trail. The only time the parking lots are full on Broadway and Myers is over night for residents, then open most of the day once people leave for work, until they return late in the afternoon/evening. It should be a shared use. In addition to the parking on Broadway and Myers, there is a large free parking lot, mostly empty at the Sprinter Station just off Oceanside Blvd. which can facilitate anyone wanting to park to ride the Inland Rail Trail. Again, the city needs to focus on finding spots for smaller parking opportunities and shared parking and not siting parking lots for bicyclists in what will be an environmentally sensitive area one restored!

XVI. RECREATION

F-12

a) 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?

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?

F-12 The City acknowledges the concerns expressed in this comment. Recreation impacts were evaluated in Checklist subsection XVI, *Recreation*, of the IS/MND. The project would add public amenities, including a public parking area and bike/pedestrian path, but would not increase the use of existing recreational facilities such that substantial deterioration would occur as these recreational amenities would serve the existing population who visit this area. In addition, the project would not require construction of recreational facilities that would result in a significant adverse physical effect on the environment. Accordingly, the IS/MND concludes that recreation impacts would be less than significant.

21

F-12 cont.

Response: Please note, decisions made today will impact residents and visitors to Buccaneer Beach Park for generations. The sitting of a parking lot on that site will have a substantial adverse effect on recreation of coastal areas. As proposed, the parking lot will flood and degrade the restoration and surrounding area. Instead of piecemealing the dedicated parkland on the north side of the creek, there should be a thoughtful park planning process that takes in the entire parkland area and seeks best uses for the topography and sense of place of the entire property. As Oceanside continues to grow, parks/open space become more important, not less important.

F-12 (cont.) The commenter's preference for alternative future recreational uses of the site has been noted for consideration by the City. No revisions to the IS/MND are required in response to this comment.

-----Original Message-----
From: Cindy Shoup <cindyshoup@icloud.com>
Sent: Tuesday, June 23, 2026 5:42 PM
To: Shannon Vitale <SVitale@oceansideca.org>
Subject: Public Comment: Buccaneer Lift Station and Force Main Project (D23-00012, RC23-00010, CUP23-00004) — Mitigated Negative Declaration (MND)

Dear Ms. Vitale and the City of Oceanside Planning Division,

I am writing to submit formal public comments regarding the Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Buccaneer Lift Station and Force Main Project (D23-00012 / RC23-00010 / CUP23-00004).

G-1

I am a directly impacted property owner and resident located at 1601 S Myers St #1, Oceanside, CA 92054. My home is located approximately 100 feet from the project footprint, directly fronting the southwest boundary of Buccaneer Park and the proposed parking lot, greenbelt, and utility reconstruction site.

G-2

While I support the permanent decommissioning of the old La Salina Wastewater Treatment Plant and the environmental remediation of Loma Alta Creek, the proposed MND does not fully address or adequately mitigate several significant localized impacts on my residential property. Please ensure the following comments and requests are entered into the official administrative record for this project:

1. Mitigation of Parking Lot Noise, Headlight Glare, and Aesthetic Impacts

The project description notes the addition of a redesigned public parking lot utilizing a portion of the old treatment plant footprint. Because my unit directly faces this area, shifting the parking footprint creates new, unmitigated sources of light and noise pollution. I request that the final design include:

G-3

Structural Landscape Buffering: Heavy, dense, and mature native landscaping or a privacy barrier along the western edge of the parking area to completely shield my residential windows and patio from vehicle headlight glare and idling engine noise.

A Physical Security Gate: The MND must mandate a physical, heavy-duty locking security gate at the parking lot entrance. This gate must be strictly enforced with a mandatory "Dawn-to-Dusk" closure policy to prevent overnight loitering, vandalism, and vehicle congregation directly adjacent to our homes.

1. Restrictions on Vehicle Access and Traffic Flow

G-4

To protect the residential character and safety of South Myers Street—especially given the introduction of the new bike and pedestrian paths and expanded park space—the vehicle entrance and exit for the new parking lot must be strictly limited to Tait Street. The S. Myers Street frontage should remain entirely pedestrian- and bicycle-focused to eliminate high-turnover traffic directly in front of adjacent residential units.

G – Cindy Shoup

G-1 The City acknowledges this introductory comment and the commenter's proximity to the project site. This comment does not identify a deficiency in the environmental analysis contained in the IS/MND, and no revisions are required.

G-2 This comment does not identify a specific environmental impact that was not previously disclosed in the IS/MND, and no revisions are required. This comment has been incorporated into the administrative record and considered as part of the Final IS/MND. Please refer to the responses below.

G-3 The City acknowledges the commenter's concerns regarding potential visual, lighting, and noise effects associated with the project's proposed public parking area. The IS/MND evaluated aesthetics, noise, and land use impacts associated with construction and operation of the project. The project includes landscaping improvements and site design features intended to improve compatibility between the project site and surrounding uses. The landscaping plan will be further refined during final design and will include plantings and screening consistent with applicable City standards and the request for landscape buffering included in this comment. Additional landscape screening would further improve compatibility between the parking area and adjacent residential uses and reduce light and glare effects resulting from vehicle headlights.

The comment additionally requests that the parking lot component of the proposed project include a physical security gate. As described further is response to comment D-5 above, OPD has prepared a CPTED report, which provides recommendations for reducing criminal activity through strategic site design, lighting, access control, visibility, and other environmental factors that can help deter crime and improve overall safety. This includes recommendations for

G-3 (cont.) security strategies and implementation of controlled access to the site and maintaining operating hours consistent with that of surrounding parks. The commenter's recommendations regarding screening buffers and safety measures have been noted and will be considered during final project design development. This comment does not identify an environmental impact that was not previously disclosed in the IS/MND, and no revisions are required.

G-4 Preliminary locations for ingress and egress for the proposed public parking lot along Pacific Street are shown on Figure 3 of the IS/MND and have been reviewed by City staff for emergency access and safety. As discussed further in response D-3 above, the City has determined that an additional driveway along South Pacific Street is necessary to provide dedicated lift station access separate from this existing Tait Street entrance. The project does not propose vehicle entrances along South Myers Street or Tait Street as the comment suggests. This comment does not identify an environmental impact that was not previously disclosed in the IS/MND, and no revisions are required.

G-5

2. Mitigation of Light Pollution and Trespass from New Park Lighting

Because my residence directly overlooks the project site and patio views, the installation of new lighting for the reconfigured parking lot, bike path, and park facilities presents a major concern for light trespass. I request that the city mandate the use of shielded, down-directed, "dark-sky" compliant lighting fixtures for all new illumination structures. These fixtures must be engineered to completely eliminate light overflow onto adjacent residential properties, ensuring that new security lighting does not shine directly onto our patios or into our windows at night.

G-6

3. Construction-Phase Vibration, Dust, and Noise Mitigations

Given our immediate proximity to the proposed 1,800 SF lift station construction site, wet/dry well excavation, and the initial tie-in for the 15,500 linear foot force main pipeline, our property will face extreme construction impacts. I request that the Mitigation Monitoring and Reporting Program (MMRP) explicitly mandate:

Strict daily construction hours limited to standard daytime periods, with absolutely no heavy machinery operation or staging on weekends.

Continuous, real-time dust suppression and air-monitoring protocols immediately adjacent to the 1601 S Myers St property line.

Pre-construction structural vibration monitoring to ensure the deep underground utility excavation does not compromise the structural integrity or foundations of our adjacent residential buildings.

G-7

1. Utility Undergrounding Integrity

I strongly support the proposed undergrounding of the existing electric distribution line. I request formal confirmation that all overhead utility lines obstructing the immediate coastal view corridor between Tait Street and Loma Alta Creek—specifically those currently impacting the view from our residential patios—will be completely undergrounded as a condition of this project's approval.

G-8

Please confirm receipt of this email, register these comments into the formal public record for the CEQA process, and provide me with all future public notices, staff reports, and Planning Commission/City Council hearing dates regarding these entitlements.

Sincerely,

Lucinda Shoup

1601 S Myers St #1
Oceanside, CA 92054
(951) 377-6140

Sent from my iPhone

G-5 The City acknowledges this comment. Visual and lighting impacts of the proposed project were evaluated in Checklist subsection I, *Aesthetics*, of the IS/MND. New lighting, including at the lift station, bike/pedestrian path, and public parking lot would be downcast and used for security and safety purposes only and would not spill into adjacent areas. In addition, temporary lighting during nighttime construction would also be downcast and limited to active work areas and is not anticipated to result in a substantial new temporary source of light or glare. Further, all lighting installed by the proposed project would be required to comply with lighting regulations outlined in City of Oceanside Municipal Code Chapter 39, *Light Pollution Regulations*, including specifications for shielding and lighting types. This comment does not identify an environmental impact that was not previously disclosed in the IS/MND, and no revisions are required.

G-6 The City acknowledges the commenter's concerns regarding temporary construction impacts related to construction hours, air quality, and vibration. As described in Section 2.5*, Construction Activities*, of the IS/MND, construction of the lift station, load equalization tank, emergency storage tank, and force main from the LSWWTP to Oceanside Boulevard (approximately 1,000 feet north of the existing force main connection point) would occur during the daytime (7:00 a.m. to 7:00 p.m.). Construction of the force main along Oceanside Boulevard would occur at night (10:00 p.m. to 4:00 a.m.) to avoid disruptions to traffic flows. Section 6.25 of the City's Municipal Code cites construction hour limitations as before 7:00 a.m. and after 7:00 p.m. Monday through Saturday, all day on Sunday, and on any federal holiday. The project will be requesting a Construction Noise Exemption from the City Manager to allow nighttime construction of the force main along Oceanside Boulevard and daytime use of a pile driver to construct the load equalization tank and emergency storage tank at the LSWWTP. Note that the specifics of construction operations would be detailed within a Traffic Control Plan that would be approved and monitored by the City Traffic Department. The Traffic Control Plan would include specifications for construction within public roadways, including requirements for signage, barricades, traffic control, driveway impairments, flag persons, overnight storage of materials, public noticing of street/lane closures, the use of night lighting and flares, temporary signal timing devices for work within signalized intersections, and ultimate removal and clean-up of construction activities. The City would notify all residents and owners along the final force main alignment prior to the required nighttime construction as part of their standard construction procedures, consistent with pre-construction protocols for other underground utility projects in the City.

G-6 (cont.) Air pollution-related impacts of the proposed project were evaluated in Checklist Subsection III, *Air Quality*, of the IS/MND. It is acknowledged that criteria air pollutant and precursor emissions would be generated from short-term construction activities. As described in Checklist subsection III.b, the project would be required to comply with San Diego County Air Pollution Control District (SDAPCD) Rule 55, *Fugitive Dust Control,* which prohibits visible dust emissions into the atmosphere beyond the property line of the project site and requires BMPs such as watering all exposed surfaces two times daily and limiting vehicle speeds on unpaved roads to 15 miles per hour. These practices are considered standard regulatory compliance and would be enforced by the City and SDAPCD, and would not be required to be incorporated into the mitigation framework for the project.

Vibration-related impacts of the proposed project were evaluated in Checklist subsection XIII, *Noise*, of the IS/MND. During construction, activity most likely to result in vibration effects would be the pile driving equipment to support the foundations of the load equalization tank and emergency storage tank. As described in Section XIII.b, the pile driver's vibration was determined to be below the applicable criteria for building damage and human annoyance at the nearest vibration sensitive land use, the single-family residences located approximately 320 feet to the west of the LSWWTP. Accordingly, impacts would be less than significant and implementation of structural vibration monitoring as suggested in this comment is not warranted. Overall, this comment does not identify an environmental impact that was not previously disclosed in the IS/MND, and no revisions are required.

G-7 The City acknowledges the commenter's support for undergrounding existing utility facilities. The scope of utility undergrounding that is part of the proposed project is described in Section 2.0, *Project Description*, of the IS/MND and shown on Figure 4, *Conceptual Electrical Utilities Underground Conversion*. The existing overhead line would be undergrounded west along Witherby Street for about 130 feet and south along Pacific Street for about 400 feet to a proposed transformer to be located between the proposed entrance gates along Pacific Street. The requested undergrounding of additional utility facilities by the commenter beyond those included in Section 2.0 are not part of the project analyzed in the IS/MND. However, the City has noted this comment and will consider additional utility undergrounding for future City projects. This comment does not identify an environmental impact that was not previously disclosed in the IS/MND, and no revisions are required.

G-8 The City acknowledges receipt of this comment. This comment has been incorporated into the administrative record and considered during preparation of the Final IS/MND. The City has included the commenter on the list of agencies, organizations, and individuals which will be notified of future project actions, including the project hearing. This comment is conclusory and no revisions to the IS/MND are required in response to this comment.

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