



March 25,2023

Planning Commission
City Oceanside
Sent via email

Subject: Comments on Draft Alternatives Analysis

Dear Chair and Planning Commission

Defining the alternatives to be considered as part of our General Plan Update (GPU) is one of the most important steps of this process- and therefore is some of the most important feedback you can provide to staff. We note that this document considered over 1,000 parcels, multiple land uses and proposed hundreds of those parcels for land use changes. Have you been provided adequate foundational Information to review all of this data and provide meaningful input? Have you been given sufficient time to review this material, and ask questions in a thorough, thoughtful way?

Please consider that the community is also expected to provide input. The community also, after years of work on this, received notice late on March 23 that this critical report was posted and could be read for the first time. The community had even less time to prepare comments than you do, in order to get their feedback to you in time for you to have a chance to read it prior to the Monday commission meeting. Our planning procedures require a minimum 10 days advance notice for public hearings. Is it not reasonable to expect at least the same amount of time for advance notice on this as we do for a single project? We urge you to inform staff of your expectations for advance notice on issues like this, both for yourselves, and for the community.

We appreciate that the overall approach to our GPU is to grow in a way that focusses on infill development, that considers what is unique about our community, and that plans for growth in a strategic, sustainable way. But the devil is always in the details, and it is those details that still need a lot of work to actually achieve the goals of this plan.

The future of our community depends upon all of us getting this right.

The following are our key concerns about these preliminary alternatives:

- **Keep South Morro Hills as is**

Our preference, the preference of over 80% of the landowners in SMH, (based on city survey),

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and of the majority of the community (based on vote to oppose conversion of farmland) is to keep SMH as is. That includes no change in minimum lot size of 2.5 acres and no transfer of development rights to create dense clustered housing - that is how we preserve our farmland.

*Preservation of farmland has been repeatedly stated as a key goal of both the GPU and the SMHCP. Yet, the workshop on **March 16,2023** was the first time the community was actually asked to provide alternative ways to save our farmland- alternatives to converting it to clustered housing and calling that preservation of farmland. Numerous alternatives were suggested- both at the workshop and in subsequent comments. Those alternatives need to be seriously considered before it is assumed that the only way to save our farmland is to build houses on it.*

We understand that the City Council provided direction to consider the SMHCP. It therefore needs to be considered. But this consideration should include some discussion of the pros and cons of this choice. One of the key negatives is that it is not consistent with numerous goals in the Vision for the General Plan and those inconsistencies must be acknowledged and addressed. Specifically, it conflicts with goals # 1,2,3,4,6,10,13, and 15.

But of equal concern is that it is not consistent with other elements of the GPU currently being developed- the Economic Development Element (EDE) adopted in 2019, Housing Element already approved in draft form, and the Smart and Sustainable Corridors Plan that describes the approach for land use planning. All elements of the General Plan are required to be internally consistent. Yet the SMHCP is in conflict with other key elements and these differences have not been disclosed or evaluated.

- Consistently treat SMH as an option – with consistent descriptions

The Alternatives Analysis (AA) assumes SMHCP generates only an additional 500 housing units of the over 21,000 included in the entire plan. These 500 units are of minor importance to the overall general plan. SMHCP is actually just a minor variation that should be considered separately.

It does not need to be included to meet the goals of the GP, or to achieve the required housing units per the Housing Element. Keeping SMH as is could be an option for any of the overall alternatives being considered; including A Dispersed Corridors, B/C Transit Forward and any additional ones that are developed later in this process. That would allow a separate decision to be made on including the SMHCP from the actual selection of an alternative.

The number of increased housing units in the SMHCP changed from 400 when the summary of alternatives was presented for the original Planning Commission meeting on March 14,2022 to 500 in this latest version. Furthermore, the 500 units added does not match the summary on Table 5-2 that shows 1,360 added to SMH with the SMHCP and 900 without it. What has changed to account for these discrepancies?

- Further explanation is needed for the conclusion that the SMHCP would only result in 500 additional housing units.

What are the baseline assumptions for the existing land use number of housing units during the time frame of the General Plan? How was it determined that the SMHCP would only result in an increase of 500 units up to year 2050? Furthermore, since each unit now must also allow an accessory dwelling unit (ADU) and a Jr ADU, then potentially 3x as many additional housing units could be added. All of that increase needs to be acknowledged and evaluated both in the recommendation to include the SMHCP, or not, and in the analysis of the environmental impacts of the changes that will occur as a result of adopting the SMHCP.

- Any discussion of climate change/ GHG emission reductions is missing from this report

The constraints discuss wildfire, flooding and Sea Level Rise- three of the major results of climate change, but completely fail to address the overall cause - climate change. The Climate Action Plan is required to be updated to address GHG emissions through 2050. These emissions will greatly increase as a result of the increased development in all of the alternatives. proposed development. These alternatives will have differential impacts on these emissions. This GPU needs to address land use and transportation in a way that will contribute to reduced GHG emissions. Our community will not be able to meet state and regional GHG reduction targets without building this in to planning the alternatives, and the details of those alternatives, from the beginning.

- The South Coast Highway corridor is being treated differently than the other corridors

Considerable time and money has been spent planning this corridor, and planning it in a way that is consistent with the rest of the guidelines in the SSCS. That corridor provides substantial opportunities for both commercial and housing growth—where there is already substantial alternative transportation and plans for more. This is another smart growth corridor that needs to be considered on an equal basis with the other corridors.

- Only one of the alternatives specifies a percentage of future growth in a corridor- Alternative B that proposes 33% along the Oceanside Blvd corridor.

All of the alternatives need to clearly indicate what percentage of growth is proposed along each corridor, and outside of the corridors so that there can be an objective comparison. This should also include the South Coast Highway corridor.

- All three alternatives assume 3,000 housing units per [SB 9](#) and 1,500 additional ADU's per changes in state law.

How were these numbers determined? What are the assumptions about how they will be distributed around the city, especially in relation to the defined corridors and SMH? Other cities have already, or are in the process of developing additional guidelines that will restrict how many more units would be added, and where they could be added under this new law. Has this AA assumed Oceanside will do nothing to mitigate these potential impacts?

- What is the impact of each alternative on our critical jobs to housing ratio

This ratio is a key to the long-term economic sustainability of our community. The alternatives have varying numbers of housing units and employment land uses. The alternatives should all be designed to achieve a numeric target for the future jobs/housing ratio- hopefully 1:1.

The Economic Development Element adopted in 2019 identified seven core economic sectors for job growth, and the need for 75 acres of additional land for industrial uses. It appears that none of the alternatives actually provide sufficient land to meet the basic growth projected for job related land uses. That needs to be just as high a priority as adding housing. We need to ensure we have adequate land set aside for job-producing land uses- not just the minimum, but enough to achieve economic sustainability.

The projected demand for housing overall is an increase of 21-33,000 units. All of the alternatives meet the minimum housing demand and the ones that create the highest number of housing units are at about the midpoint of the range.

But the job producing land uses have not been treated consistently. Table 5-3 projects non-residential development. The text describes reduced demand for retail with only about a 25% increase over the next 30 years for a total growth of 645- 1.2 m sq ft. Yet all alternatives provide far more than the minimum and the highest meets 100% of the demand. That means that through 2050 we will continue to allocate much more land to retail than projections say will be needed.

For office space, in spite of changing patterns for office use, all alternatives greatly exceeded the minimum demand. That demand was projected as 900- 1.6m sq.ft., yet all of the alternatives provide at least 1.2msqft – again potentially allocating more land than appears to be needed.

The EDE called out a need for an additional 75 acres of industrial land. In the AA the demand was projected as 4.6- 8.5m sq.ft, yet none of the alternatives even met the minimum demand and all were far short of even meeting the mid-point of the range. This is particularly concerning because Oceanside has a long history of approving developers requests to convert industrial land to housing. We have given up the very land we now have a great need for, and exacerbated our job/housing ratio while doing so. In addition, the AA describes a need for flexible, R and D space of 1.1 – 2.2 m sq ft- yet this land use is not even shown on Table 5-3.

Agriculture was one of the seven core economic sectors identified in the EDE. This is an employment related job use that should also be specifically included on Table 5-3. The AA seems to assume that the SMHCP would produce more jobs from agritourism, but has not accounted for the loss of jobs from converting farmland to clustered housing. Furthermore, agritourism could be added to the existing conditions in SMH with no clustered housing. That could have a positive impact on the job/housing ratio which has been ignored.

All of the alternatives appear to support further loss of job producing land in Morro Hills and elsewhere—which will further exacerbate our jobs/housing ratio. There should be several

alternatives that really strive to address our housing imbalance—while still meeting our Regional Housing Needs Assessment numbers. Preserving farmland for farming needs to be part of that analysis.

Table 5-3 should account for all of the job producing land uses, including flexible R and D and agriculture. This table should show the demand for each land use and what is provided in each of the alternatives. In the absence of that detail, it appears that some job producing land uses will have an excess supply while others are greatly shortchanged. Again, all of the elements of the GP need to be internally consistent and the EDE and Land Use as described in this AA are not.

- This list of alternatives is not sufficient for the AA required by CEQA

CEQA requires a reasonable range of alternatives that at a minimum must include a No Project comparison, as well as alternatives specifically designed to address any significant adverse impacts that are identified through the environmental review process. All alternatives will need to be reconsidered once that analysis has been done. Hopefully that will also help identify what should be the Preferred Alternative- one that is actually consistent with the vision of the community and leads us to a sustainable future.

Thank you for considering our comments.

Sincerely,

Diane Nygaard, President
On Behalf of Preserve Calavera
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