



NOTICE OF PREPARATION

City of Oceanside, California

Date: February 14, 2020

To: California Office of Planning and Research
Responsible and Trustee Agencies
County Clerk
Other Interested Parties

Subject: Notice of Preparation of a Supplemental Environmental Impact Report

Project: Ocean KAMP (T19-00004, D19-00016, CUP19-00021)

Lead Agency: City of Oceanside

Applicant: Zephyr Oceanside LLC

Pursuant to Section 15082(a) of the California Environmental Quality Act (CEQA), the City of Oceanside, as a Lead Agency, is distributing a Notice of Preparation (NOP) to solicit comments on the scope of a Supplemental Environmental Impact Report (SEIR). The SEIR will address the Ocean KAMP Project based on environmental changes from the previously approved Pavilion at Oceanside project, located on the same site.

The City is seeking public and agency input on the scope and content of the environmental information to be contained in the SEIR, which will address changes or updates to the previously prepared environmental analyses based on (1) the change in project type and (2) changed regulatory conditions. This NOP presents information on the project location, project history and background, current project description, intended uses of the previously certified EIR, choice of CEQA document, and a summary of the SEIR contents currently proposed. Information regarding timing and location of a scoping meeting for this project is also provided.

Pursuant to CEQA Guidelines Section 15163, an SEIR will be prepared to evaluate whether new significant effects would result from implementation of the Ocean KAMP project, compared to the environmental impacts disclosed in the previously certified EIR for the Pavilion at Oceanside project.

Pursuant to Section 15103 of the CEQA Guidelines, your response to this NOP must be received by our agency no later than thirty (30) days from the posting date. Should you have any questions regarding the project or NOP, please call Sergio Madera, Principal Planner, at (760) 435-3539. Please transmit your written comments on this project via post, email, or fax to:

City of Oceanside
Development Services Department – Planning Division
Attn.: Sergio Madera, Principal Planner
300 North Coast Highway
Oceanside, California 92054
Phone: (760) 435-3539
Fax: (760) 754-2958
Email: smadera@oceansideca.org

Location: The Ocean KAMP Project site encompasses approximately 92 acres located at 3480 Mission Avenue, Oceanside, CA 92054, in San Diego County. The project is located north of Mission Avenue and State Route 76 (SR 76), immediately east of Foussat Road and west of Fireside Street (see Figure 1, *Regional Location*, and Figure 2, *Project Vicinity*). The project site includes 15 parcels, comprised of Assessors' Parcel Numbers (APNs) 160-270-31, -79, and -82; 160-280-14, -48, -49, -50, -51, -53, -54, and -55; 160-290-58, -60, -63; and 160-270-77 (a parcel located at the northeastern corner of Foussat Road and SR 76 that is currently owned by the City). Surrounding land uses include the San Luis Rey River located north and west of the property, the Oceanside Municipal Airport to the west, Oceanside Fire Department Station No. 7 to the south (between SR 76 and Mission Avenue), the City of

Oceanside's Mission Basin Groundwater Purification Facility located to the northeast, and a combination of single-family residential and commercial development and open space located to the east and south. A San Diego Gas & Electric (SDG&E) transmission line easement traverses the center of site in a north-south direction. The site has previously been used as a drive-in movie theater and swap meet.

The project site is zoned as Community Commercial (CC) with a Community Commercial (CC) General Plan Land Use Designation. The southwestern-most portion of the site is located within the Avigation Easement Area of the Oceanside Municipal Airport. Portions of the site are within designated Safety Zones 1, 2, 3, 4, and 6 of the Oceanside Municipal Airport Land Use Compatibility Plan (OMALUCP), with the entire site within Review Area 1.

Project History and Background:

The Final EIR for the Pavilion at Oceanside project was certified by the City of Oceanside on November 19, 2008 (State Clearinghouse No. 2006111033). The EIR is available for review at:

https://www.ci.oceanside.ca.us/gov/dev/planning/project/ocean_kamp_mixed_use_development.asp

Hard copies of the Final EIR and appendices for the Pavilion at Oceanside project are available at the following locations:

City Hall
300 N. Coast Hwy.
Oceanside, California 92054

Mission Branch Library
3861-B Mission Avenue
Oceanside, California 92058

That project addressed construction and operation of a 950,000-square foot (SF) shopping center located within an approximately 92-acre site previously used for a drive-in theatre. At the time of EIR preparation, the site was used for weekend swap meets and other periodic events. The Pavilion at Oceanside project proposed shopping, dining, and entertainment elements. The project application included a Tentative Parcel Map, Development Plan, five Conditional Use Permits (movie theater, health club, and three drive-through uses), and an Underground Waiver request for the existing high-voltage electrical transmission lines located on the site. The Tentative Parcel Map proposed to divide the site into 10 parcels for leasing purposes, where each commercial parcel would include building, hardscape/landscape, and parking areas. Approximately 459,000 cubic yards (CY) of imported fill material was identified as being required to ensure proper drainage and installation of underground utilities to serve the proposed development. The Reduced Project/Draft Subarea Plan Alternative addressed in the EIR was approved for implementation.

Environmental analyses presented in the certified EIR addressed ground disturbing activities during grading and base site preparation of approximately 88.3 acres, as well as environmental effects associated with construction or operation. Topical areas for which no impacts, or less than significant impacts, were identified included Agricultural Resources, Mineral Resources, Recreation, and Population/Housing. The Pavilion at Oceanside project was found not to have significant growth-inducing effects as it would be consistent with the General Plan and zoning designations of the property, and would be population-serving rather than population-generating.

Significant and mitigable impacts were identified for the following environmental issues:

- **Biological Resources:** jurisdictional impacts to 0.12 acre of southern willow scrub, 0.39 of disturbed southern willow scrub, and 0.22 acre of disturbed wetland; loss of approximately 40 acres of non-native grassland; and potential indirect impacts to sensitive species within the San Luis Rey River associated with fugitive dust, invasive plants, habitat fragmentation, noise, and night-lighting
- **Cultural and Paleontological Resources:** potential to impact buried cultural resources and fossil-bearing portions of the Eocene Santiago Formation

- **Geology and Soils:** potential issues associated with ground settlement associated with liquefaction and dynamic compaction
- **Hazards and Hazardous Materials:** release of isolated concentrations of the pesticide dieldrin and toxaphene (associated with prior on-site agriculture starting in 1928 until approximately 2000) during grading, and potential removal of on-site soils contaminated by leakage from an off-site underground storage tank if such soils are identified on site during grading, potential asbestos and lead associated with on-site structures, and overflight safety compliance
- **Noise:** potential for construction noise to adversely impact least Bell's vireo breeding between March 1 and September 1
- **Transportation/Traffic:** direct impacts on the segments of Mission Avenue between Foussat Road and El Camino Real, El Camino Real between Los Arbolitos Boulevard and Mission Avenue, North Douglas Drive between Pala Road and El Camino Real (two segments); and at the intersections of Pala Road/North Douglas Drive and SR 76/ Rancho del Oro Drive

Mitigation measures and/or measures incorporated into project design through conditions of approval were identified to reduce each of these potential impacts to less than significant levels.

Two topical areas were identified as having significant and unmitigable impacts under CEQA. Project effects for which significant impacts were identified that would not be reduced to less than significant levels through implementation of required mitigation measures included:

- **Transportation/Traffic:** Roadway segment of North Douglas Drive between North River Road and Pala Road (constrained by the bridge over the San Luis Rey River, with right-of-way limitations identified in the City Circulation Element); and El Camino Real between Mesa Drive and Oceanside Boulevard (short-term impact during construction related to construction haul trucks)
- **Global Climate Change:** An incremental contribution to global climate change was assessed as "extremely small" (a contribution to statewide carbon dioxide of approximately 0.0000577 percent) but was considered significant and unmitigable due to a lack of identified standards or criteria.

Although mitigation measures were identified that would reduce impacts to El Camino Real and climate change, they were not identified as feasibly reaching less than significant levels.

Project Description: The project site is currently zoned as Community Commercial with a Community Commercial General Plan Land Use Designation. Mixed-use development is allowed under the current Community Commercial zoning, subject to approval of a Mixed-Use Development Plan and Conditional Use Permit. The project proposes approximately 36 acres of commercial uses within the central/southwestern portion of the site and approximately 36 acres of residential uses within the northern and eastern portions of the site. The remaining 20 acres of the site are proposed to be preserved as open space, including a 4-acre stepping-stone wildlife corridor located along the eastern property boundary.

The proposed Mixed-Use Development Plan would be an integrated plan, where uses would be sited to share parking, traffic circulation and an alternative transportation system, recreational and open space areas, and utilities and infrastructure. The proposed project site would be developed in two integrated areas – a resort community and a residential area. Commercial uses within the resort community component are proposed to include a 300-room resort hotel, a conference facility, a surf lagoon beach club, and 11 commercial buildings consisting of approximately 130,000 SF of office, retail, restaurants, and fitness uses, totaling approximately 472,850 SF. Approximately 1,055 parking spaces are proposed to accommodate the commercial uses. The residential uses are proposed to include approximately 700 dwelling units within nine residential lots.

The project would be designed consistent with the Zoning Ordinance and consistent with the General Plan Housing Element and Land Use Element. The project proposes a reduced density of commercial uses compared to the 950,000 SF of commercial uses proposed under the approved the Pavilion at Oceanside project. The proposed commercial uses would be designed to be consistent with the development regulations of the Community Commercial zoning, including standards related to building coverage, landscaping, parking, and setbacks. The mixed-use development would also include residential uses located adjacent to the existing residential areas to the east and north of the project site. Establishment of appropriate setbacks and consistency with the development standards presented in the Mixed-Use Development Plan prepared for the project would ensure that the proposed residential uses would be compatible with existing surrounding development and City standards.

Use of the Previously Certified EIR: Portions of the previously approved project related to the site footprint are underway. The site is currently being graded in compliance with the prior approval and pursuant to required conditions of the previously approved project (the 88.3-acre Reduced Project/Draft Subarea Plan Alternative). Applicable mitigation measures have been/are being completed pursuant to the Mitigation Monitoring and Reporting Program prepared for that project.

The Ocean KAMP Project SEIR is intended to serve as a supplement to the previously adopted 2008 Final EIR where the currently proposed project would result in environmental effects that are potentially greater than effects disclosed in that document. Modifications particularly relate to potential changes in proposed land uses associated with the new project (mixed-use development versus the primarily retail uses previously analyzed) and/or where changes in regulations or City plans may require new analysis. Impacts and conditions presented in the previous EIR will serve as the primary base of comparison for the analysis. All proposed uses would occur within the graded impact footprint identified in the previously adopted EIR. The SEIR will incorporate applicable mitigation measures for proposed future actions that were identified in the previously certified EIR. Overall, straight "footprint" impacts related to vegetation removal, potential for on-site hazardous substances, etc. have already been addressed and will not need new review. Also, because the currently proposed project would generate fewer vehicular trips than the previous project, it is anticipated that previously assessed impacts for transportation/traffic and air quality would be lessened. Elements of the prior analysis that are unchanged will not be re-analyzed in the SEIR, but a summary discussion of those areas for which impacts remain the same or would be lessened will be provided for the reader's use.

Choice of a Supplemental versus Subsequent EIR: Per CEQA Guidelines Section 15162, a Subsequent EIR must be prepared when the Lead Agency determines one or more of the following, based on substantial evidence in the light of the whole record:

- Substantial changes are proposed in the project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following: (1) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (2) Significant effects previously examined will be substantially more severe than shown in the previous EIR; (3) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (4) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Per CEQA Guidelines Section 15163, a Supplemental EIR can be prepared if any of the conditions listed above would require preparation of a Subsequent EIR, and only minor additions or changes would be necessary to make the

previous EIR adequately apply to the project in the changed situation. A Supplemental EIR does not require the previous EIR to be “recirculated” and focuses on inclusion of the information necessary to make the previous EIR adequate for the project as revised.

In this instance, conditions associated with ground disturbance are expected to be highly similar/identical to those assessed for the Pavilion at Oceanside project, and in other instances (e.g., traffic and air quality) impacts are expected to be lessened. Confirmation of areas in which the prior assessment was wholly adequate will be documented in the SEIR. Because impacts are expected to be generally the same or reduced, and new areas of discussion are expected to be few in number, a Supplemental EIR has been chosen as the CEQA document. The City reserves the right to produce a Subsequent EIR as appropriate based on responses to this NOP and findings of updated technical analyses.

Potential Environmental Effects and Anticipated Contents of the SEIR: It is anticipated that most of the environmental effects of the proposed project would be similar to or less than those identified in the Pavilion at Oceanside EIR. Implementation of residential uses, however, was not anticipated in the certified EIR. The following issues (at a minimum) will be addressed in the SEIR relative to Ocean KAMP components differing from the Pavilion at Oceanside.

- **Project Description:** This section will provide detail as to the proposed project, presenting narrative and graphics supporting discussion of project elements, necessary and relevant permits, other responsible or trustee agencies, results of tribal consultation, etc.
- **Aesthetics:** This section will compare the Ocean Kamp Project to the Pavilion at Oceanside relative to visual effects and community character.
- **Hazards & Hazardous Materials:** This section will address safety hazards due to proximity to the airport.
- **Land Use and Planning:** This section will confirm consistency with existing adopted plans, policies, and zoning.
- **Transportation/Traffic:** A vehicle miles travelled (VMT) analysis will be completed in accordance with new CEQA Guidelines to take effect on July 1, 2020. Updates to traffic patterns/minimization of impacts will be addressed as appropriate.
- **Utilities:** Results of the Water Supply Assessment will be presented.
- **Public Services:** The Ocean KAMP Project proposes residential uses, which will require review of public facility availability such as schools, libraries, and park and recreation facilities.

The SEIR will clearly identify potential new significant impacts of the proposed project, if any, and recommend possible mitigation measures to eliminate or substantially reduce identified significant impacts, as appropriate and feasible. The SEIR will also consider whether changed conditions require updated analysis of cumulative impacts per CEQA Guidelines Section 15130, and/or an analysis of project alternatives per Section 15126.6 if new significant impacts are identified that were not addressed through alternatives during review of the Pavilion at Oceanside project. Responses received to this NOP may modify or add to the preliminary assessment of potential issues addressed in the SEIR.

PUBLIC SCOPING MEETING

The City of Oceanside will hold a public scoping meeting to obtain information regarding the content and scope of the Draft SEIR consistent with Section 21083.9 of the Public Resources Code. This scoping meeting will take place on Tuesday, February 25, 2020, from 6:00 to 8:00 pm at the Oceanside Public Library Community Room located at 330 North Coast Highway, Oceanside, CA. Free public parking is available in the adjacent City parking structure with access from Civic Center Drive and Ditmar Street. The scoping meeting format will consist of a brief project presentation, followed by an open house forum with city staff and applicant representatives. All public agencies, organizations, and interested parties are encouraged to attend and participate in this meeting.

Signature:



Sergio Madera, Principal Planner

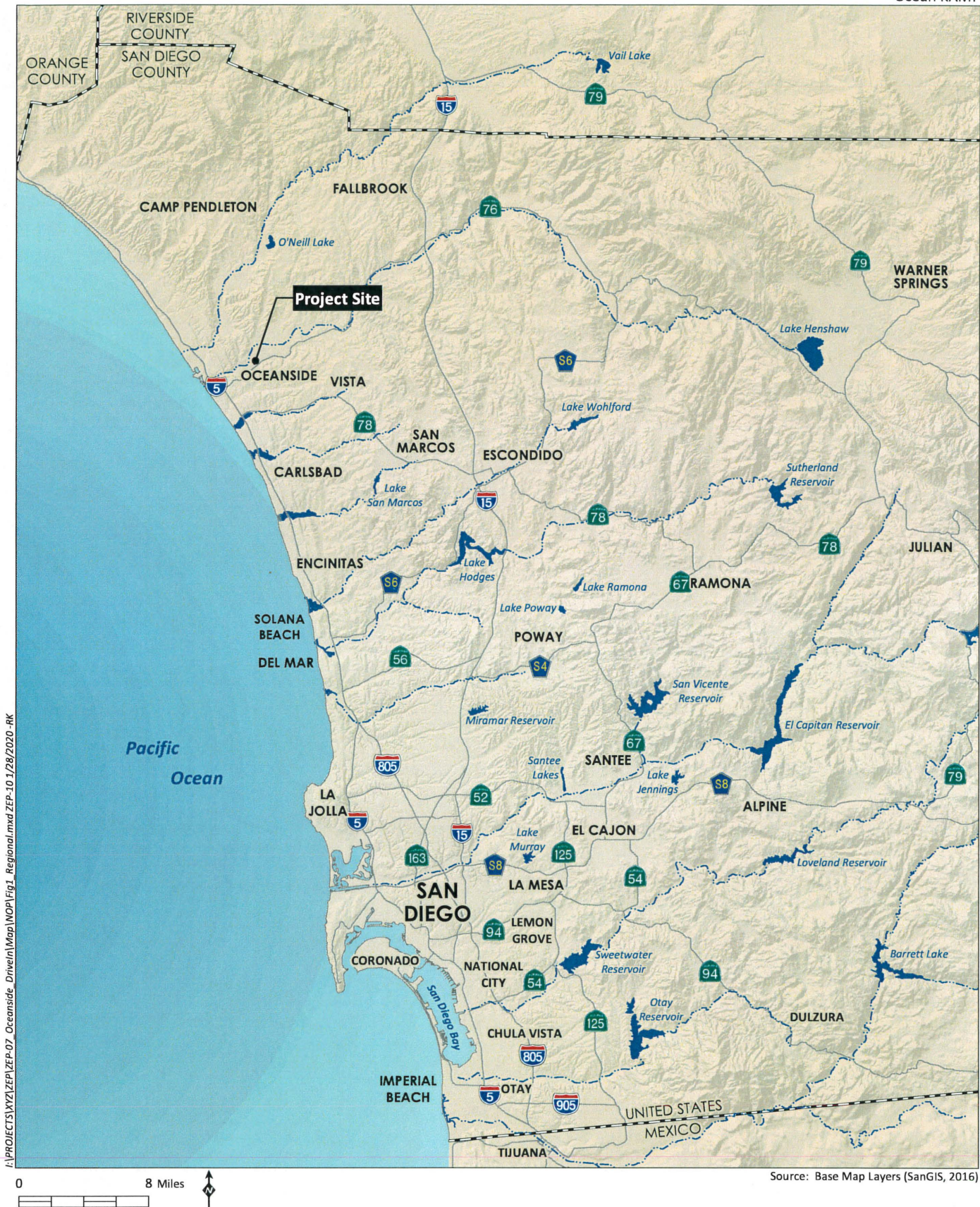
Date: February 14, 2020

Attachments:

Figure 1, Regional Location

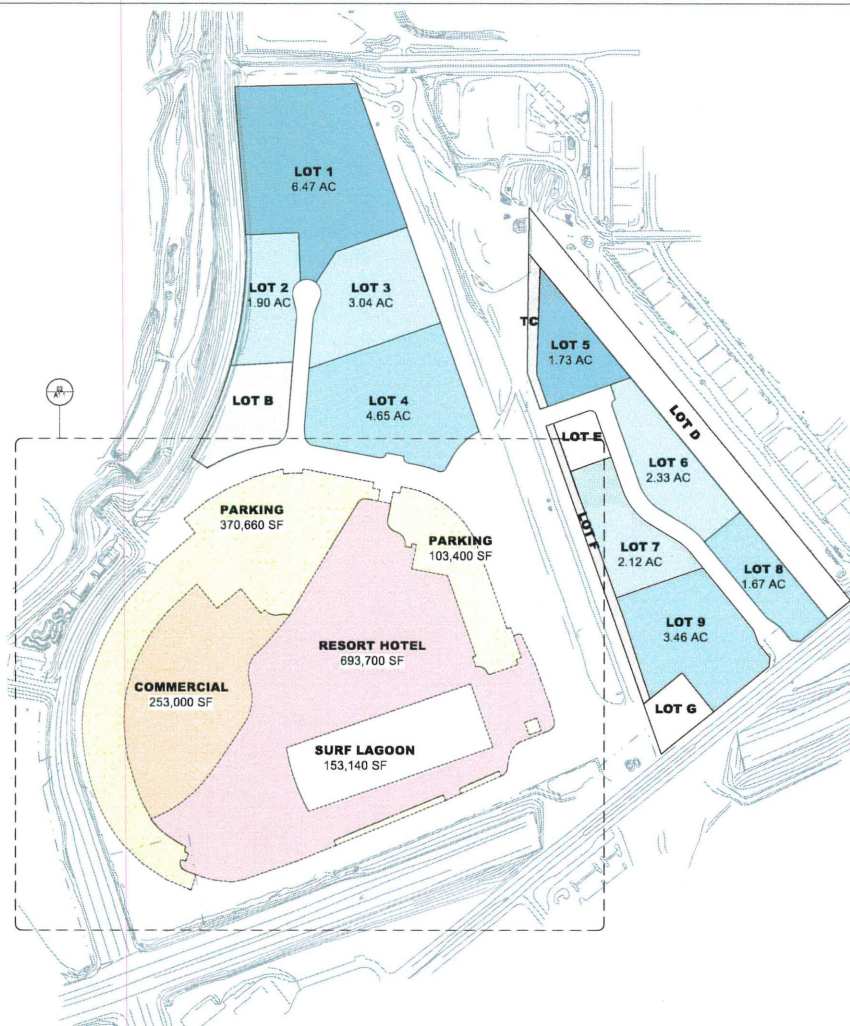
Figure 2, Project Vicinity

Figure 3, Mixed Use Development Plan

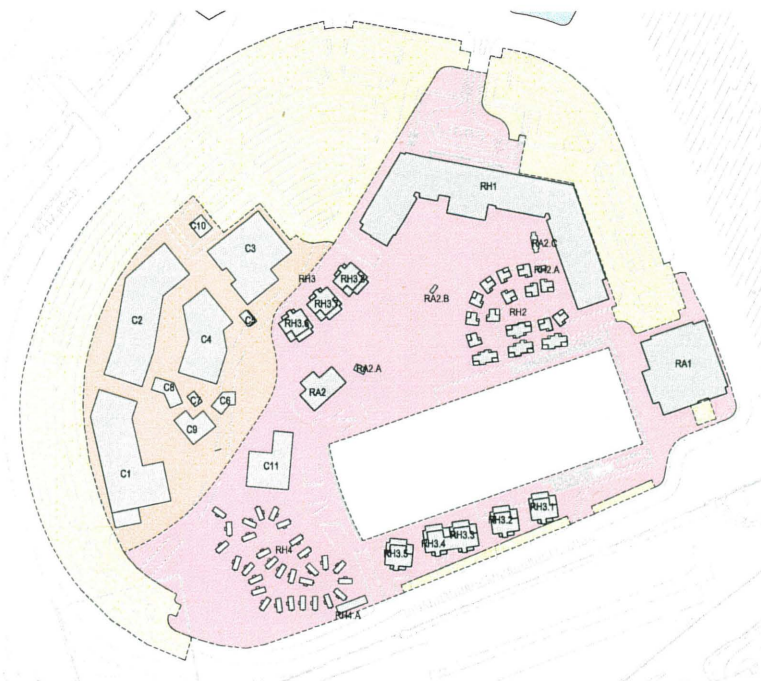




I:\PROJECTS\XYZ\ZEP\ZEP-07 Oceanside Drive\Map\NOP\Fig2 ProjectLocation.mxd ZEP-10 1/28/2020 -RK



01 OVERALL SITE PLAN - MIXED USE DEVELOPMENT PLAN



02 SITE PLAN - COMMERCIAL USE

Source: Gensler 2019

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

4050 TAYLOR STREET, MS-240

SAN DIEGO, CA 92110

PHONE (619) 688-3137

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

March 16, 2020

11-SD-76
PM 2.615
Ocean KAMP
NOP/SCH#2006111033

Mr. Sergio Madera
Principal Planner
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

Dear Mr. Sergio Madera:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation for Supplemental Environmental Impact Report for the Ocean KAMP located near State Route 76 (SR-76). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Study

- 1) A traffic impact study (TIS) may be necessary to determine this proposed project's near-term and long-term direct and cumulative impacts to the State facilities - both existing and proposed - and identify appropriate mitigation measures.
- 2) The study should include a vehicle miles of travel (VMT) analysis that uses the guidance for VMT analysis provided in the "Technical Advisory on Evaluating Transportation Impacts in CEQA" prepared by the Governor's Office of Planning and Research (OPR)¹.

¹California Governor's Office of Planning and Research (OPR), 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

- 3) The appropriate level of study is determined by the particulars of a project, the prevailing transportation system conditions (inclusive of freeways, highways, transit systems and facilities, bike and pedestrian facilities, points (hubs) of major modal connectivity), forecasted traffic volumes, and forecasted utility for each mode.
- 4) At a minimum, the existing volumes should be taken from a two-day mid-week 24-hour count, a three-day mid-week 24-hour count is preferred.
- 5) Calculations of development's trip distribution and trip assignments for the project need to be included.
- 6) With reference to Item 1 above, the TIS should include, at a minimum,
 - a) Existing Conditions
 - b) Existing plus Project
 - c) Near Future without Project
 - d) Near Future with Project
 - e) Horizon without Project
 - f) Horizon with Project
- 7) The data used in the TIS should not be more than two years old.
- 8) Please provide the electronic files (Synchro Version 10, or other) that were used to analyze the traffic impacts and other technical appendices included with the TIS.

Hydrology and Drainage Studies

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review.
- Provide a pre and post-development hydraulics and hydrology study. Show drainage configurations and patterns.
- Provide drainage plans and details. Include detention basin details of inlets/outlet.
- Provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- On all plans, show Caltrans' Right of Way (R/W).
- Early coordination is recommended.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Oceanside is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Mitigation

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

Mr. Sergio Madera
March 16, 2020
Page 4

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

Right-of-Way

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,



MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review



NATIVE AMERICAN HERITAGE COMMISSION

RECEIVED

February 18, 2020

FEB 24 2020

CITY OF OCEANSIDE
DEVELOPMENT SERVICESSergio Madera, Principal Planner
City of Oceanside
300 N Coast Highway
Oceanside, CA 92054

Re: 2006111033, Ocean KAMP (T19-0000\$, D19-00016, CUP19-00021) Project, San Diego County

Dear Mr. Madera:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

CHAIRPERSON
Laura Miranda
LuiseñoVICE CHAIRPERSON
Reginald Pagaling
ChumashSECRETARY
Meri Lopez-Keller
LuiseñoPARLIAMENTARIAN
Russell Attebery
KarukCOMMISSIONER
Marshall McKay
WintunCOMMISSIONER
William Mungary
Paiute/White Mountain
ApacheCOMMISSIONER
Joseph Myers
PomoCOMMISSIONER
Julie Tumamali-
Stenslie
ChumashCOMMISSIONER
[Vacant]EXECUTIVE SECRETARY
Christina Snider
PomoNAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



March 9, 2020

Sent via email: smadera@oceansideca.org

City of Oceanside

Planning Division

Attn.: Sergio Madera, Principal Planner

300 N. Coast Highway

Oceanside, CA 92054

Re: Ocean KAMP (T19-00004, D-19-00016, CUP19-00021) Supplemental Environmental Impact Report

Dear Mr. Madera,

This letter is written on behalf of the Rincon Band of Luiseño Indians (“Rincon Band” or “Band”), a federally recognized American Indian Tribe and sovereign government. Pursuant to Public Resources Code §21092.2, we request to be notified and involved in the entire CEQA environmental review process for the entirety of the project’s duration. Please also include the Band on all distribution lists for environmental document reviews, consultations, circulation of public documents, and notices for public hearings and scheduled approvals.

The Rincon Band has received the Notification of Implementation of a Supplement Environmental Impact Report (SEIR) for the above referenced project. From the project transmittal, the Band understands that the project would include demolition of four existing structures, including grading work and import of fill to ensure appropriate drainage.

We have reviewed the provided Final Environmental Impact Report from 2008 and we are in agreement with the recommendations within the Cultural Resources Section but would like to request the following clarifications to mitigate potential impacts to undiscovered buried archaeological resources on the Project site:

- The EIR states that an archaeological monitoring program would be implemented which would include “the development of a pre-excavation agreement between the applicant and the appropriate Luiseño tribe(s) or other Native Americans as determined by the City”. We request that the measure will be clarified to reflect that a culturally-affiliated Tribe should enter such an agreement.
- We recommend that such archaeological monitoring program defines that avoidance of cultural resources is the preferred treatment method. If avoidance is not feasible, we ask for reburial on project site; only if on-site reburial is not feasible, cultural resources should be curated in an appropriate facility in San Diego County.

Bo Mazzetti
Chairman

Tishmall Turner
Vice Chair

Laurie E. Gonzalez
Council Member

Alfonso Kolb, Sr.
Council Member

John Constantino
Council Member

- The Band asks to ensure that no invasive or non-invasive testing will be permitted without the permission of the consulting Tribes.
- Rincon asks that in discussion with the consulting Tribes, protocols will be established pertaining to the handling of Native American cultural materials and human remains.
- The Bands asks that all imported fill brought to the project site, will be free of cultural resources.
- The Rincon Band asks to be provided with a Final Phase IV report upon completion.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635 extension 323 or via electronic mail at cmadrigal@rincon-nsn.gov.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,



Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

SAN LUIS REY BAND OF MISSION INDIANS

1889 Sunset Drive • Vista, California 92081

760-724-8505 • FAX 760-724-2172

www.slrmissionindians.org

February 24, 2020

Sergio Madera
Principal Planner
Development Services Dept. – Planning Division
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

VIA ELECTRONIC MAIL
smadera@oceansideca.org

**RE: SLR RESPONSE REGARDING THE NOTICE OF PREPARATION OF A
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE
OCEAN KAMP PROJECT (T19-00004, D19-00016, CUP19-00021)**

Dear Mr. Madera:

We, the San Luis Rey Band of Mission Indians (“Tribe”) have received and reviewed the City of Oceanside’s (“City’s”) Notice of Preparation (“NOP”) of a Supplemental Environmental Impact Report (“SEIR”) for the Ocean KAMP Project (“Project”) dated today, February 14, 2020 and inquiry whether the Tribe has any knowledge of tribal cultural resources or sacred places that may be impacted by the proposed Project. The Tribe concurs with City’s determination that CEQA Guidelines Section 15163 applies and that an SEIR should be prepared to evaluate whether new significant effects would result from implementation of the Project.

Our Tribe is aware of a multitude of tribal cultural resources, including traditional cultural landscapes and sacred sites, within the Project impact area that may be potentially significantly impacted. The Tribe strongly urges caution in assessing the land encompassing the Project for development and zoning purposes, as well as incorporating the presence of a Luiseño Native American monitor during all ground disturbing activities (including any geotechnical and/or exploratory excavations) and tribal cultural resource assessment surveys.

The Tribe has enjoyed a mutually respectful relationship with the City over the years and would appreciate an opportunity to continue to discuss this Project’s potential negative impact on our Luiseño cultural resources through confidential, government to government consultation as provided for by AB 52.

We appreciate the opportunity to share with the City of Oceanside regarding this Project and thank you for your assistance in protecting our invaluable Luiseño Native American cultural resources.

Sincerely,

A handwritten signature in black ink, reading "Merri Lopez-Keifer". The signature is fluid and cursive, with the first name "Merri" being more prominent and the last name "Lopez-Keifer" following in a similar style.

Merri Lopez-Keifer
Chief Legal Counsel
San Luis Rey Band of Mission Indians

cc: Melvin Vernon, Tribal Captain
Carmen Mojado, Secretary of Government Relations



San Diego County Archaeological Society, Inc.

Environmental Review Committee

20 February 2020

RECEIVED

FEB 24 2020

CITY OF OCEANSIDE
DEVELOPMENT SERVICES

To: Mr. Sergio Madera, Principal Planner
Planning Division
Development Services Department
300 North Coast Highway
Oceanside, California 92054

Subject: Notice of Preparation of a Supplemental Environmental Impact Report
Ocean KAMP
T19-00004, D19-00016, CUP19-00021


Dear Mr. Madera:

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

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

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

Sincerely,


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

cc: SDCAS President
File

Sergio Madera

From: Diane Nygaard <dnygaard3@gmail.com>
Sent: Monday, March 2, 2020 3:32 PM
To: Sergio Madera
Subject: Comments on Oceans KAMP NOP for Supplemental EIR

Warning: External Source

Mr. Madera

We disagree with the determination that a Supplemental EIR is the appropriate CEQA review. The original EIR identified GHG as having significant impacts that were not mitigatable- and none were proposed. The City now has an adopted Climate Action Plan that includes mitigation for GHG impacts. The proposed project needs to be evaluated for compliance with this new local plan, to identify changes in GHG emissions that are different from the approved project, and to provide adequate mitigation for these impacts. In addition there are numerous mitigation measures that have been defined for other projects in this region so it is not defensible to say that the previous determination that there is no feasible mitigation is still true.

This new CEQA analysis must do a comprehensive analysis of the GHG for the revised project and properly consider its compliance with the adopted CAP, and provide full mitigation for any adverse impacts.

The project also needs to include timing of project construction which could dramatically impact a number of the factors that are required to be considered.

Lastly the transportation analysis needs to include VMT and should update the LOS analysis done for the Pavilions as housing tends to have much greater peak hour impacts than commercial development.

Diane Nygaard



Ocean KAMP Project (T19-00004, D19-00016, CUP19-00021)

Supplemental Environmental Impact Report Scoping Meeting

Oceanside Public Library Community Room, 330 North Coast Highway, Oceanside, CA

February 25, 2020 – 6:00PM TO 8:00PM

COMMENT FORM

(PLEASE DEPOSIT YOUR FORM IN THE DROP BOX WHEN DONE, THANK YOU!)

Some questions to keep in mind as you write your comments below (please use the back of this sheet if needed for additional comments):

- What significant environmental issues, reasonable alternatives, and/or mitigation measures should be identified in the SEIR?
- What important environmental issues have not been included in the Notice of Preparation issued for public review on February 14, 2020?

MAIN CONCERN

ACCESS TO PROJECT — IMPACTS TO NEIGHBORHOOD

IT APPEARS FOUNTAIN WILL BE A MAIN ACCESS.

THE ~~SEIR~~ SURROUNDING NEIGHBORHOOD ONLY HAS TWO

ACCESS POINTS — BOTH OVER A TWO LANE BRIDGE.

THIS NEEDS TO BE ADDRESSED.

AT LAST ZEPHYR MEETING THE DEVELOPER SUGGESTED

USING BENET TO GAIN ACCESS. THIS WOULD PUT

THOUSANDS OF TRIPS ON BENET. PLEASE

CAREFULLY CONSIDER THIS. ANOTHER TRAFFIC

SIGNAL ONLY INCREASES COMMUTE TIME.

SHARE THE ROAD — DEDICATE A LANE FOR PASS

THRU TO THE NEIGHBORHOODS — THANK YOU

PRINT YOUR NAME: NEIL HANCOCK

ADDRESS: 3449 ASHLWOOD

CITY: OS06

ZIP CODE: _____

PHONE NUMBER: 760 560 3067

EMAIL ADDRESS: _____



Ocean KAMP Project (T19-00004, D19-00016, CUP19-00021)

Supplemental Environmental Impact Report Scoping Meeting

Oceanside Public Library Community Room, 330 North Coast Highway, Oceanside, CA

February 25, 2020 – 6:00PM TO 8:00PM

COMMENT FORM

(PLEASE DEPOSIT YOUR FORM IN THE DROP BOX WHEN DONE, THANK YOU!)

Some questions to keep in mind as you write your comments below (please use the back of this sheet if needed for additional comments):

- What significant environmental issues, reasonable alternatives, and/or mitigation measures should be identified in the SEIR?
- What important environmental issues have not been included in the Notice of Preparation issued for public review on February 14, 2020?

*1. HOUSING Density @ 19 units per
ACRE. WAY too Dense.. estimating
3 people per unit, that's 2100 more
people and probably 2100 more cars
in the neighborhood

*2. Transportation. Fouscat is to be
a main entrance the intersection at 76
& Fouscat is already heavily impacted by
traffic stoppers. No real plans for better
traffic flow

*3. Noise - NO plans exist to mitigate noise

*4. AIRPORT - Plane traffic is directly
over the Surf Lagoon Blvd. and be full
of people

*5. wildlife - what plans are there to protect
wildlife in the river?

PRINT YOUR NAME: Ernest Kenneth McCollick

ADDRESS: 3425 SPINDRIFT ST.

CITY: OCEANSIDE ZIP CODE: CA 92058

PHONE NUMBER: 714-658-6635

EMAIL ADDRESS: LXX11123@Yahoo.com



Ocean KAMP Project (T19-00004, D19-00016, CUP19-00021)
Supplemental Environmental Impact Report Scoping Meeting
Oceanside Public Library Community Room, 330 North Coast Highway, Oceanside, CA
February 25, 2020 – 6:00PM TO 8:00PM

COMMENT FORM

(PLEASE DEPOSIT YOUR FORM IN THE DROP BOX WHEN DONE, THANK YOU!)

Some questions to keep in mind as you write your comments below (please use the back of this sheet if needed for additional comments):

- What significant environmental issues, reasonable alternatives, and/or mitigation measures should be identified in the SEIR?
- What important environmental issues have not been included in the Notice of Preparation issued for public review on February 14, 2020?

✓ Please explain crash protection zone size & how the rest of the project ability to handle a potential crash and fire & hazardous waste

✓ Please explain water usage if it will be potable & how this will affect current rate payers -

— why is the city paying Zephyra any funds -

— Justify why zoning should be changed to include housing & include detailed maps

PRINT YOUR NAME: _____
ADDRESS: Yodie _____
CITY: _____ ZIP CODE: _____
PHONE NUMBER: _____
EMAIL ADDRESS: _____

~~Justify~~ Fully do a comprehensive traffic study including the entire area from

T-5 to El Camino Real - Comprehensive - include fire / can't make - Plans