

Nathan Tracy  
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June 21, 2025

Dane Thompson  
Associate Planner  
City of Oceanside Planning Division  
300 N. Coast Highway  
Oceanside, CA 92054

Subject: Public Comment Opposing the Oceanside Garrison Project - GPA24-00002 / Request for Full EIR

Dear Mr. Thompson,

I am writing as a concerned Oceanside resident and direct neighbor to the proposed Oceanside Garrison Project at 333 Garrison Street (APN: 162-020-26). I respectfully submit this comment during the public review period to oppose both the rezoning and the adoption of a Mitigated Negative Declaration (MND) for this development.

#### Summary of Concerns

While I recognize the city's need to support housing development, this particular proposal raises several serious concerns that I believe warrant a full Environmental Impact Report (EIR) rather than the abbreviated

MND process. The issues outlined below illustrate that the project may cause significant, unmitigated impacts to the environment, community infrastructure, and neighborhood quality of life:

### 1. Zoning Incompatibility & Loss of Public Land

The proposed rezoning would convert land currently designated as Public/Semi-Public (PS) and Civic Institutional (CI) into medium-density residential-eliminating a rare, city-owned civic asset. The former Garrison Elementary School site represents long-term community value that should remain open for future educational, recreational, or civic use.

### 2. Inadequate Traffic & Infrastructure Planning

This project will introduce 140 units-potentially adding 280+ vehicles daily to a neighborhood not designed for this traffic volume. Garrison Street and its nearby intersections already serve as school and commuter corridors, and adding this much density without corresponding transportation improvements will lead to congestion, safety concerns, and infrastructure strain.

### 3. Lack of Affordable Housing Alignment

The project vaguely claims that a portion of the units will be "affordable to moderate-income households," but provides no binding commitments, no income thresholds, and no alignment with the city's RHNA goals.

### 4. Negative Impact on Neighborhood Character

The proposed buildings-ranging up to 2,093 square feet-are oversized relative to the adjacent single-family homes and will materially alter the character of the surrounding neighborhood.

### 5. Environmental & Green Space Concerns

This development would permanently remove over 8 acres of potential green space with only a 10,000 sq ft "pocket park" proposed-less than 3% of the site area. There is no significant open-space preservation or meaningful habitat protection.

## 6. Precedent-Setting for Irreversible Civic Loss

Approving this rezoning sets a dangerous precedent that encourages the sale and privatization of civic land across Oceanside.

## Conclusion & Request

Due to these unresolved issues, I respectfully request that the City of Oceanside:

- Reject the current Mitigated Negative Declaration, and
- Initiate a full Environmental Impact Report (EIR), in accordance with CEQA.

I appreciate the City's responsibility to manage growth, but this proposal is not the right fit-either for the site, the infrastructure, or the community. I urge you and the Planning Commission to reconsider this course of action.

Sincerely,

Nathan Tracy

## **Rebuttal to City Response (RTC-12)**

Nathan Tracy

304 Bluff Way

Oceanside, CA 92054

ntslide@gmail.com

(714) 614-5061

August 17, 2025

Oceanside Planning Commission

c/o Dane Thompson, Associate Planner

City of Oceanside

300 N. Coast Highway

Oceanside, CA 92054

Subject: Rebuttal to City Response (RTC-12) - Oceanside Garrison Project (GPA24-00002)

Dear Commissioners,

I am submitting this formal rebuttal to the City's responses to my previously submitted comment (RTC-12) concerning the proposed Oceanside Garrison Project. While I appreciate the City's effort to respond, I find the responses to be inadequate under CEQA, lacking in analysis, and in some cases, factually inaccurate. As a neighbor directly impacted by this project, I remain deeply concerned that the use of a Mitigated Negative Declaration (MND) instead of a full Environmental Impact Report (EIR) is inappropriate, given the substantial evidence in the record that this project may cause significant environmental impacts. The fair argument standard has clearly been met.

As the California Environmental Quality Act (CEQA) makes clear, a full EIR is required whenever there is a "fair argument" - supported by substantial evidence - that a project may cause a significant environmental impact. The threshold is intentionally low, and the benefit of the doubt is meant to go to the environment and public. This rebuttal highlights multiple areas where such fair arguments exist and are supported by the City's own documentation or public record.

#### 1. TRAFFIC IMPACTS UNDERSTATED (RTC I2-2, I2-4):

According to the Local Transportation Study (Appendix E), the project would generate approximately 973 daily trips. This increase would push Oceanside Boulevard from LOS E into LOS F at multiple intersections. The City's response incorrectly relies on traffic impact fees in lieu of actual mitigation. CEQA does not allow payment of fees to substitute for required mitigation when service levels decline to unacceptable levels. This represents a significant, cumulative impact that mandates a full EIR.

#### 2. LOSS OF CIVIC LAND AND IRREPLACEABLE PUBLIC USE (RTC I2-3, I2-7):

The City's assertion that the site is not zoned open space misses the larger point: the land was historically a school site, serving public and community needs. The failure of civic infrastructure (collapsed sewer, asbestos, etc.) led to the school's closure-not a lack of need. Turning this site into private housing without a comprehensive community planning process transforms a civic failure into a permanent community loss.

#### 3. BIOLOGICAL AND ENVIRONMENTAL RESOURCE LOSS (RTC I2-5):

Appendix G confirms the presence of Diegan coastal sage scrub, a sensitive vegetation community. This is further compounded by the City's location within a Multi-Habitat Planning Area (MHPA). Even if the area is disturbed, CEQA requires that sensitive habitats be assessed and mitigated at the landscape level. Removal without meaningful offsets or conservation easements is insufficient.

#### 4. HAZARDOUS MATERIALS RISK (NOT ADDRESSED):

The Phase I ESA (Appendix K) and supporting documentation acknowledge asbestos and lead present on-site. The City's RTC fails to acknowledge or discuss these hazards during demolition and construction. These risks pose serious health and air quality concerns to

adjacent residents, particularly those immediately downwind (as is my residence) or downslope.

#### 5. INADEQUATE AFFORDABLE HOUSING COMMITMENTS (RTC I2-6):

The City's reference to 10% moderate-income units is insufficient in addressing RHNA obligations, particularly for very-low and low-income households. There is no legally binding affordability term or monitoring requirement indicated. The remaining 5% is being satisfied with in-lieu fees, which fail to serve those most in need of housing. This project does not align with the Housing Element's goals of affordability, equity, or fair housing.

#### 6. CUMULATIVE IMPACTS AND PRECEDENT (RTC I2-8):

Finally, approving this rezoning and development sets a troubling precedent: that city-owned land with civic utility can be converted to private use without full environmental review or community consensus. CEQA mandates consideration of precedent-setting actions as part of cumulative impact review. This project violates both the spirit and the letter of that mandate.

#### Conclusion:

Based on the presence of multiple fair arguments supported by substantial evidence — including from the City's own appendices — I urge the Planning Commission to reject the current MND and require a full Environmental Impact Report. The City's response fails to address numerous CEQA obligations, ignores known infrastructure and environmental risks, and disregards the community's historic connection to this land.

As Oceanside grows, we must hold ourselves to higher standards of accountability, sustainability, and public trust. Decisions about the future of city-owned land should be made transparently, with full environmental review and genuine community participation. A full EIR is not only a legal requirement but it also reinforces trust in due process to your voting and tax paying public.

Very respectfully submitted... I know everyone has the best interests in the community in mind and I'm deeply appreciative of the forum to keep the public involved.

Nathan Tracy

## **Appeal of Planning Commission Decision – Garrison Project (GPA24-00002)**

Date: August 27, 2025

Appellant: Nathan Tracy

Address: 304 Bluff Way, Oceanside, CA 92054

Phone: (714) 614-5061

Email: ntslide@gmail.com

Project: Garrison Multi-Family Development – GPA24-00002

Appeal Filed Against: Oceanside Planning Commission approval on August 25, 2025

### **Grounds for Appeal**

I respectfully appeal the Planning Commission's unanimous approval of the Garrison Multi-Family Development and request a de novo review by the Oceanside City Council. This project raises serious unresolved concerns that merit a full Environmental Impact Report (EIR) and a broader policy discussion around the conversion of public land.

### **Basis for Appeal**

#### **1. Inappropriate Use of Mitigated Negative Declaration (MND):**

The project involves significant traffic, infrastructure, and environmental impacts, including degradation of Oceanside Boulevard to LOS F with a volume-to-capacity increase that exceeds the City's CEQA threshold. CEQA requires a full EIR when substantial evidence supports a fair argument of significant impact. The MND circumvents this requirement and should be rejected.

#### **2. Loss of Civic Land Due to Past Mismanagement:**

Garrison Elementary closed not due to declining enrollment, but due to civil infrastructure failure. Reclassifying and developing this site as private housing rewards mismanagement with irreversible rezoning. This is not consistent with the General Plan's goals for civic resilience or public land retention.

### 3. Public Trust and Transparency:

The community was not adequately engaged on alternative uses for this former school site. No public-serving alternatives were studied. Approval of this project under an MND sets a precedent for shortcutting CEQA on similar civic-to-private land transfers.

### Requested Action

I request that the City Council reject the Planning Commission's approval of the Garrison Project and require a full Environmental Impact Report. I also urge the City to revisit long-term land use policies involving former public land and prioritize community-serving alternatives.

Respectfully submitted,

Nathan Tracy

## Dane Thompson

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**From:** Nathan Tracy <ntslide@gmail.com>  
**Sent:** Tuesday, August 19, 2025 4:49 PM  
**To:** Dane Thompson  
**Cc:** Planning-Planning Commission  
**Subject:** Re: Public Comment Opposing the Oceanside Garrison Project - GPA24-00002 / Request for Full EIR  
**Attachments:** AUG19\_Nathan\_Tracy\_Garrison\_Rebuttal.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Hello Mr. Thompson,

I appreciate the formal response to my opposition letter.

This rebuttal pertains to your original comment (RTC-12) and addresses flaws in the City's response.

Respectfully,

Nathan Tracy

On Sat, Jun 21, 2025 at 3:56 PM Nathan Tracy <[ntslide@gmail.com](mailto:ntslide@gmail.com)> wrote:

Mr Thompson,

I love Oceanside and understand adding neighbors to our community is a good thing.

I'd assert that these developments should happen without rezoning space zoned and designated for public schools (in use currently or not), and should never shortcut full EIR in accordance with the CEQA.

Formal opposition letter attached. If any questions arise my contact information and address are also included.

Respectfully,

Nathan Tracy

## Dane Thompson

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**From:** dyanne klinko <beachwaves@comcast.net>  
**Sent:** Thursday, August 21, 2025 8:39 PM  
**To:** Planning-Planning Commission  
**Cc:** Dyanne Klinko  
**Subject:** Item 4 on the Agenda to re-zone for the purpose of adding more housing

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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To Whom it May Concern,

I would like to give you my thoughts about yet another development for housing that I see is on the agenda (Item 4).

I do not understand why the Planning Commission deems it necessary to add more people, more cars on already problematic roads and highways, water shortages we deal with every summer. It seems to me that the Planning Commission wants to change the face of Oceanside and turn it into a miniature Los Angeles.

I came here to retire. I chose Oceanside because it is a beautiful, beach town with tourists and locals enjoying our beaches, harbor, and pier. But I believe what you are doing is changing the whole look and feel of this very unique city. Why do you think that re-zoning so you can squeeze in a bunch of affordable and luxury apartments is good for the people that are already here??

It seems that the Commission wants to put up apartments in every available space. Cant find space? Let's just re-zone neighborhoods so you can add more housing. This is ridiculous and I would like to have my complaint added to the agenda.

Whats happening here is wrong.

Thank you,

Dyanne Klinko

## Dane Thompson

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**From:** Diane Nygaard <dnygaard3@gmail.com>  
**Sent:** Wednesday, August 27, 2025 11:07 AM  
**To:** Teala Cotter  
**Cc:** Dane Thompson; Hamid Bahadori; Darlene Nicandro  
**Subject:** Inadequate LTS for Garrison School Site Project =and Others

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Hi Teala

Etrakit does not show any review of transportation done for the project- but there was a LTS included as an appendix for the MND. Plus the mitigation was changed from what was proposed in the MND to payment of \$ 110k to the city's Thorough Fare program. So it is clear there was some review of this.

My concern is that this LTS failed to consider alternative transportation. The ITE guidance for local transportation studies, that the city of Oceanside posts on its website as part of the info for developers, is very specific about the need to consider alternative transportation. The ITE guidance is very specific that in addition to identifying existing conditions for bike, pedestrian and transit, the local transportation study should " identify opportunities to increase connectivity, frequency of service, and level of comfort. "

The LTS for this project failed to identify existing conditions or evaluate any opportunities for improvement. We have seen several other recent LTS that identified existing conditions for alternative transportation , but failed to evaluate any opportunities for improvement.

At a minimum- we believe every LTS should be required to address alternative transportation existing conditions and opportunities for improvement as part of the routine staff review process. Only when a satisfactory LTS has been provided should a project be processed for approval.

This is especially important for those projects in our smart growth corridors where increased density is being directed- but there is inadequate alternative transportation to give people real choices. Requiring developers to address this, as included in the ITE guidance, is a small step in the right direction. OF course we also need to establish a fee program that supports alternative transportation and not just roads for cars.

Please let me know what action will be taken to ensure this project, and every other one, properly considers alternative transportation impacts .

Thank you.

Diane

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City of Oceanside Planning Division  
300 N. Coast Highway  
Oceanside, CA 92054

Subject: Support for General Plan Amendment GPA24-0002

Dear Planning Commissioners and City Council Members,

We are writing to express support for General Plan Amendment GPA24-0002. As local business owners in Oceanside, we believe this amendment will be an asset to the city.

We urge the Planning Commission and City Council to adopt GPA24-0002. Thank you for your dedication to our city and for considering this important amendment.

Sincerely,



John La Raia / President



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