Agenda Item Position Slip

City of Oceanside

Submitted On:
Jan 28, 2026, 04:49PM EST

Email	amandaclaue@gmail.com
Council Meeting Date	01/28/2026
Agenda #	APN157-412-15-00 (Having a hard time finding this info)
Subject	Guajome Lake Homes high density project
Position	In Opposition
Name	**First Name:** Amanda **Last Name:** Laue
Oceanside Resident	Yes
Full Address	**Street Address:** 5421 Old Ranch road **City:** Oceanside **State:** CA **Zip:** 92057
Comments	I am unsure if I gave the accurate Agenda #; I cannot find it on Oceanside website. I have a 3 minute speech specifically about this project and I am a resident that lives next to the open field slated for this Guajome Lake home high density project. Thank you.

Stephanie Rojas

From:	Ann Laddon <annmladdon@gmail.com>
Sent:	Wednesday, January 28, 2026 1:47 PM
To:	City Clerk; City Council
Cc:	Ann Laddon
Subject:	Letter in regards to Guajome Lake Homes Appeal
Attachments:	A Laddon letter to Council 1 28 26.pdf

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Dear City Clerk and Council,

Please find attached my letter outlining deficiencies and inadequacies in the EIR for Guajome Lake Homes.

I appreciate your time considering this project--approval will forever negatively impact what your own draft General Plan has recognized as one of Oceanside's, "Remarkable Communities."

Please don't be the council that is branded with "The mistake by the Lake"

Please be the council that uses the full discretion you are allowed, and deny this horrible project.

Sincerely yours,

Ann Laddon
annmladdon@gmail.com
619-933-6233 (mobile)
5435 Albright St, Oceanside, CA 92057

January 28, 2026

To: Honorable Mayor and Members of the Oceanside City Council

From: Ann Laddon, 5435 Albright Street, Oceanside, CA 92057

Re: Request to Deny the EIR for the Guajome Lake Homes Project
Tentative Map T22-0004/Development Plan D22-0009/Density Bonus DR22-00005

I urge the City Council to **deny certification** of the Environmental Impact Report for the proposed Guajome Lake Homes. This is simply a terrible project which will destroy the character of this unique community.

The EIR is required to inform the public about potential impacts. It should identify and analyze impacts, then avoid or minimize impacts whenever possible. I am not opposed to housing, but there must be adequate environmental review and mitigation of impacts. This EIR does not pass muster on either. My letter highlights several, but not all, of the deficiencies, inadequacies, and omissions in the EIR.

"The requested waivers of Equestrian Overlay Standards would not affect nearby horse owners." FEIR 12.3

Clearly the respondent has no experience with horses, as the proximity of 83 homes directly adjacent to horse properties greatly affects those properties, both the horses and their owners' safety, not to mention the property's value as an equestrian estate.

Horses are prey animals, and therefore "flight" animals. Loud noises, such as basketballs on back boards and balls flying over fences, or yard equipment, for example, can cause horses to spook and bolt, resulting in injury. The stress from this encroachment on their "pastoral" environment can result in serious illnesses, such as colic (which can be fatal) and ulcers (which require ongoing treatment.) Smoke from outdoor grills has severe negative effects on horses as they have extremely sensitive respiratory systems.

Also from 12.3: "Residential uses are generally considered compatible with equestrian uses, and perimeter fencing and retaining walls will ensure separation from existing equestrian uses in the surrounding area." The Equestrian Overlay (EO) defines what residential development is compatible with equestrian uses, and that definition does not include 83 homes shoe-horned into under 10 acres. This project also seeks waivers to setbacks and therefore does not honor the 40-foot setback between stables and homes outlined in the EO, therefore the horse properties to the west and southeast will lose critical buffer between their properties and the development. This will substantially erode the property values of these equestrian properties because they no longer enjoy the protections of the EO.

“There are no equestrian trails that cross the project site currently and no access point into the park immediately across from the project site.” There are no equestrian trails that cross the project site because it has been private property, and any future development has been subject to the EO, which requires equestrian accommodation. The property immediately west includes land on the south side of Guajome Lake Road, and does have access to the Park. The EIR does not provide for any accommodation for the safe crossing of Guajome Lake Road for this neighboring property, despite the fact that the project will be introducing double the traffic to Guajome Lake Road. Guajome Lake Road is an easement across several properties, which have a portion of their property on the south side. Whether these are active horse properties is irrelevant to their right to safely access their property, and especially to guarantee their property value as enjoying the protections of the EO.

These are just a few of the inadequacies and deficiencies in the EIR as relates to the Equestrian Overlay District. These issues have either been mischaracterized, misunderstood, or incorrectly designated as valid.

Inaccurate assignment of the project as “infill” DEIR 4.1-7 *Excerpted and summarized from Preserve Calavera Comments on FEIR August 11, 2025*

The DEIR lists as the second project objective: “Provide..residential units on an infill development site.” Attempting to classify areas as “infill” without any evidence or data, has been ruled in the Court of Appeal to be a violation of the California Environmental Quality Act (CEQA)

The data shows the opposite from the EIR’s unfounded claims that the Project is “infill.” SANDAG has identified this area as having the second highest possible Vehicle Miles Travelled (VMT) designation with the closest transit over 1.75 miles away, as admitted by the DEIR. The project is clearly not within a Transit Priority Area (TPA), which is a requirement to be designated as an “infill” project.

Public Resources Code Section 21061.3 defines “infill” as sites within urbanized areas “immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, *and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.*” The project site is bordered north and south by a preserve (Guajome County Park) and protected riparian habitat, respectively, and equestrian estates to the east and west. It clearly does not meet the above definition.

The incorrect characterization of the project site as an “infill” project further erodes the foundational zoning documents applicable to this community, the Equestrian Overlay Zone. This also serves to discount any Growth Inducement consequences of the project, as well as impacts on the current equestrian community.

Section 12-5 of response to comments states the following: "As discussed in Draft EIR Section 4.15, Traffic and Circulation, the LTA conducted for the project evaluated four scenarios: Existing, Existing Plus Project, Near Term, and Near Term Plus Project, and determined that the project would not result in traffic impacts as defined in the Oceanside Traffic Guidelines; thus no off-site roadway improvements are recommended or required." The responses are based on the following calculations in Local Transportation Analysis (LTA) in Appendix K.

It goes on to state, "The project does not propose improvements to an unpaved segment of Guajome Lake Road located southeast of the project site. As shown in the LTA and summarized above, the proposed project would not add substantial traffic volume to Guajome Lake Road to require additional off-site improvements." In fact, the EIR acknowledges that Guajome Lake Road does not currently meet fire code standards but relies on future project improvements to assume compliance. This is unacceptable. Guajome Lake Road has multiple blind curves, and 800 feet of the road will remain unpaved, with the increased traffic creating more pollution from the dirt road and multiplying the risk of serious accident.

There are dangerous issues in the LTA. While it states that the volume of traffic on Guajome Lake Road would "not result in traffic impacts as defined in the Oceanside Traffic Guidelines" it does not take into account the Equestrian Overlay and the ~100 horses that are boarded along Guajome Lake Road and adjacent side streets, all of whom use Guajome Lake Road for access to the Park and its trails.

Guajome Lake Road serves as a de-facto trail to reach the Park equestrian trail. There are sections of the road that do not have DG bridle paths, or even shoulders, therefore the horses are sharing the road with vehicles. The introduction of 830 additional car trips daily is substantial because the analysis does not recognize the current Equestrian Zoning (and the presence of ~100 horses) in its calculation.

The developer is improving only its frontage to the intersection with Albright Street, and makes no accommodation for Equestrians, instead building a concrete side walk and curb instead of a DG and split rail fence walkway. Concrete and curb will further erode the equestrian friendly environment. The responses also reflect an ignorance on the challenges of evacuating horses from properties whose owners have bought and live there with the assurance that this is first and foremost a safe community for horses.

Not all horse owners have trailers, and in emergency evacuations, the equestrian community come to one another's aid. The pinch points and blind corners on Guajome Lake Road will not accommodate horse trailers passing simultaneously in opposite directions, much less 160 additional cars average exiting from the development onto the same road.

The EIR is completely silent on this subject, only stating that, "circulation and emergency access drives have been designed in consultation with Oceanside Fire Department staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site (Draft EIR, p. 3-5). This would ensure adequate emergency access and safe driving conditions." *This assessment refers only to the development itself, and not how emergency vehicles going in opposite directions, just like horse trailers, will be able to negotiate the substandard road and blind corners***.**

It also calls into question the 200-foot proximity between the two ingress/egress to the development, which was questioned at the Planning Commission meeting in August. The developer's response was that they placed the driveways that close in order to not have an exit onto a blind corner. My point exactly. They protect the development from impaired sightlines at the expense of current residents.

Growth Inducing Impacts

Under CEQA (California Environmental Quality Act), **growth-inducing impacts** are a required EIR analysis of how a project fosters economic, population, or housing growth, either by directly providing services (like roads, utilities) to undeveloped areas, removing growth obstacles (like water supply limits), or creating significant new jobs, thereby encouraging other development and potentially leading to significant environmental effects like increased traffic, habitat loss, and strain on public services, which must be evaluated for consistency with local land use plan

The EIR minimizes growth inducement and fails to analyze how sewer and infrastructure extensions, including a 2000 foot sewer connection, remove constraints and facilitate future development near Guajome Park.

02.143/02.1434 state: "The Draft EIR analysis of population, housing, and potential growth inducement ***is based on the currently approved and proposed projects in the City***. Similar to the proposed project, any development that may be proposed in the future at the site identified in the commenter's Attachment D would also be required to go through the CEQA process and evaluate whether any associated population growth was accounted for in the City's General Plan." "***Based on the currently approved and proposed projects in the City"*** This is a key point to refute. The Guajome community is the only area in the City with an Equestrian Overlay Zoning and it cannot be compared to other projects, therefore the stated justification that this project is not growth inducing is false.

By waiving the EOD, and building connecting sewer, this project qualifies as Growth Inducing. It will trigger a cascade effect, encouraging other projects to be proposed, whether by turning local ag land into housing, or individuals adding multiple ADUs to current properties. The EIR comments discount the impact of the sewer on Growth Inducement, but that is incorrect. Any development will have half of the infrastructure in place at the start.

The waiving of the EOD, and the developer's complete lack of interest to integrate even the most basic equestrian friendly features, such as a DG sidewalk with split rail fence along its frontage integrated with its improvements, further degrades the equestrian friendly nature of this community.

Without even these simple amenities, any future improvements on the road will follow this developer's lead and ignore equestrian amenities. And so the dominos fall, and with them, one of Oceanside's truly rare gems of a community.

Indirect growth-related impacts (additional development pressure, increased VMT (Vehicle Miles traveled and Green House Gas emissions, habitat loss, and service demand) are dismissed without meaningful analysis. VMT/GHG: the EIR does not adequately address the effects of increased Vehicle Miles Traveled (VMT) and Green House Gases (GHG) that this development will impact.

Note-the project "screened out" of analysis because it generates <1000ADT and claims to be consistent with General Plan. Nevertheless, SANDAG has identified that the Project site will produce VMT at levels over 100% to 125% of Regional Mean.

These miles are concentrated along Guajome Lake Road in both directions, an area of sensitive habitat, a recognized wildlife corridor, and immediately opposite a nature preserve, Guajome County Park. Horses pastured or traveling along the road will experience higher exposure to dangerous emissions and stress related to traffic, noise, and incidents of accidents.

There are fewer than 30 homes total on Guajome Lake Road. This project triples the number of residences. Because this project is over 1.7 miles from the nearest transit hub, residents will be forced to use cars to get to work, school, shops, adding hundreds of VMT and GHG. None of these impacts have been correctly addressed in the EIR, which continues to view them through the lens of "currently approved and proposed projects in the City," in communities which are not protected by the Equestrian Zoning Overlay.

Section 12-2 responses to comments on the degradation of the Scenic Overlay state that the project is consistent with adjacent developments: "Further, the project is located in an urbanized area such that the project is reviewed for potential conflict with applicable zoning and other regulations governing scenic quality, not whether it would substantially degrade the existing visual character or quality of public views of the site and its surroundings".

The project site is within the Scenic Park Zoning Overlay, which is intended to conserve and protect natural resources in and around Guajome Park. The EIR does not explain how the project would comply with these resource-protection purposes or how grading and development would affect the resources the overlay is intended to conserve.

Anyone who has driven Guajome Lake Road will shake their head in disbelief to read that, "the project is located in an urbanized area," and that the project matches the density of adjacent developments. Those statements could not be further from the truth.

The properties on Guajome Lake Road average two acres per parcel, and are zoned for horses. Jeffries Ranch lots average ¼ to ½ acre, with horse facilities and horse trails. Even Rancho San Geronimo's lot sizes, whose entrance is opposite the park entrance, average 6500 sq ft lots, and has horse trails.

In comparison, the average lot size of the GLH project is only 3200 sq ft. To accomplish this, they are seeking seven zoning waivers, including the Equestrian Overlay which, up until now, has protected the rural character of this community.

The developer seeks to justify waiving of the Equestrian Overlay citing earlier developments, but fails to state that the San Geronimo development was approved prior to adoption of the Equestrian Overlay in 1991, and in fact, the San Geronimo development was one of the impetuses for creating the Equestrian Overlay District in order to protect this community from further non-compatible development.

Lack of Adherence to Oceanside General Plan, Guajome Sphere of Influence, 1.37

The stated objectives in 1.37 are as follows:

"To protect the valuable natural and cultural resources of Guajome Regional Park by insuring that future development in areas adjacent to or visible from Guajome Regional Park will be compatible with its recreation and scenic areas.

The Policies include:

A. The City shall recognize the sphere of influence boundary line established by the Cities of Oceanside and Vista, the Board of Supervisors of San Diego County **and the Guajome Regional Park Area Planning and Coordinating Committee**

B. The City shall solicit the Guajome Regional Park Area Planning and Coordinating Committee for comments and recommendations on proposed projects within the Guajome Regional Park Sphere of Influence during the development review process.

This Coordinating Committee, when convened, is comprised of the highest-level planners of the member municipalities, working jointly to review proposed projects in the Sphere of Influence. Per the General Plan, convening this committee is not optional, but required when a proposed project falls within the Sphere of Influence. The Guajome Lake Homes Project most definitely within the Sphere of Influence.

Which leads me to the deficiency:
Nowhere in the EIR is this Coordinating Committee referenced; nor any convening of this mandated Committee; or solicitation of comments or recommendations.

The lack of compliance with the City's General Plan and Land Use policy 1.37, Guajome Lake Sphere of Influence represents a serious oversight in the EIR.

In closing, I wish to reiterate that while the City Council has little discretion to deny an exempt project, this project IS NOT EXEMPT, in fact it is subject to the highest level of CEQA review: an EIR, and the City has FULL DISCRETION to DENY the EIR.

I appreciate your time and efforts to understand this complicated project. Attending City Council Meetings over the past two months has given me a greater understanding, and certainly an appreciation, for the difficult decisions you make. I hope you will make a decision to support your 176,000+ residents in opposition to this project that is so incredibly bad for Oceanside.

Sincerely,

Ann M. Laddon

Stephanie Rojas

From: Barbara Swanson <baswanson100@gmail.com>
Sent: Wednesday, January 28, 2026 11:52 AM
To: City Council; City Clerk
Cc: guardguajome@yahoo.com
Subject: oppose EIR for Guajome Regional Park housing development

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Dear Oceanside City Council members,

I live in Encinitas and am the Vice President of the Buena Vista Audubon Society. I lead bird walks and nature journaling outings to Guajome Regional Park, and enjoy the large park with its variety of habitats, plants and animals. Because Guajome Regional Park is a special environment within our dwindling amount of open space, I urge you to deny the certification of the Environmental Impact Report.

While the EIR for the proposed housing development appears to inadequately address many issues, I will highlight a few that especially concern me.

1. Can the road safely handle so many more vehicle trips? What about all the additional dust that will be generated and the impact on people, horses and wildlife? Could everyone safely evacuate with their animals from this neighborhood in the case of a fast-moving wildfire approaching the area?

2. Removing habitat will impact wildlife in the area. Once species of concern is the California Gnatcatcher. What are the specific plans and timeline to mitigate for removing nesting habitat from the area such that there would not be impact on the birds? These birds are very site-specific, and the current plan mentioned in the EIR may not be adequate.

A large study was released a few years ago, showing that birds are declining by about 4% a year. It is easy to see why this can happen, as habitat is continually removed to make way for human-related uses such as housing. How will you mitigate losing all this habitat so that this project isn't responsible for the loss of bird and other wildlife?

3. How will putting so many dense houses interrupt the flow of wildlife in the area? For many animals, this development will be a barrier in the years to come. The actual building process will also be very disruptive to wildlife; what will be done to mitigate that? For example, birds nest in a specific, usually short time, and if they miss that window of opportunity, they will not breed for that year.

4. How does this project conserve and protect natural resources and views near Guajome Regional Park, which is part of the Scenic Park Overlay? It appears to be contrary to the goals of this policy.

I believe that we should all have answers to these and other questions involving the EIR, based on science and thoughtful consideration. Please deny the certification of the Environmental Impact Report.

Thank you.

Barbara Swanson, Ph.D.

Stephanie Rojas

From: C <chereanabowman@gmail.com>
Sent: Wednesday, January 28, 2026 11:27 AM
To: City Council; City Clerk
Cc: guardguajome@yahoo.com
Subject: Deny Certification of EIR Report
Attachments: Dear City Council Members.pdf

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Attached is my letter to the City Council Members:

Dear City Council Members,

As a resident of Oceanside near Guajome Park, I urge the City Council to **deny certification** of the Environmental Impact Report. Guajome Park is the most beautiful park in Oceanside and building homes in this area has major negative impacts on residents, our land, animals, and environment.

The EIR has many deficiencies and it should not be given certification. It lacks analysis of how it will impact wildlife and animal habitats, water quality and road safety. This is very dangerous and cannot be approved without being further evaluated.

Thank you for your consideration and denial of the EIR.

Sincerely,

Chereana Bowman

Stephanie Rojas

From: Claudia Goedde <claudiagoedde@icloud.com>
Sent: Wednesday, January 28, 2026 11:40 AM
To: council@oceanside.org; City Clerk
Subject: Guajome Park

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As a resident and equestrian of Oceanside, I urge the City Council to deny certification of the environmental impact report. As a hiker, nature lover, and horse rider, we already have too little nature trails in the area. Guajome has been a joy for me and my family to take trail rides in and go for walks or bike rides. We are deeply concerned and saddened that this will change. I am also very worried about all the precious wildlife. As I was informed there are many safety risks to horses, wildlife, and people if this housing project goes ahead. The EIR does not adequately account for the many risk factors, it does not adequately analyze cumulative impacts from this project combined with other nearby developments that would add traffic to Guajome Lake Road and nearby intersections. There are many other reasons which have already be named. I just wanted to add our family to the list of very concerned citizens and urge you to deny the certification of this Environmental Impact Report. Thank you very much.
Respectfully,

Claudia Goedde, Stephen Sova, Tobey Sova, and Celina Sova

Stephanie Rojas

From:	David Oppenheim <david72199@icloud.com>
Sent:	Wednesday, January 28, 2026 11:08 AM
To:	City Council; City Clerk
Cc:	guardguajome@yahoo.com
Subject:	Urgent Request to Deny Certification of Environmental Impact Report (EIR) for Guajome Lake Homes Project

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David Oppenheim
5349 Blackberry Way, Oceanside, Ca 92057
760-889-1964
david72199@icloud.com
1/28/2026

The Honorable City Council Members
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

Subject: Urgent Request to Deny Certification of Environmental Impact Report (EIR) for Guajome Lake Homes Project

Dear Esteemed City Council Members,
As a resident of Oceanside, bird watcher, nature lover and retired state highway maintenance and safety worker, I am writing to express my profound concern and strong opposition to the proposed Guajome Lake Homes project.

I emphatically urge the City Council to deny certification of the Environmental Impact Report (EIR) for this development. Guajome Regional Park and its surrounding natural environment are invaluable community assets, and this EIR critically fails to adequately assess and mitigate the significant, adverse impacts this project would undeniably create.

While I am not inherently opposed to responsible housing, I believe any development in such a sensitive area demands a transparent, thorough, and accurate environmental review. The current EIR for the Guajome Lake Homes project suffers from fundamental deficiencies that prevent it from fulfilling its legal and ethical obligation to inform the public and ensure environmental protection. These critical shortcomings include:

❤️ Regarding Public Health & Safety:

Guajome Lake Road Risks: The EIR fundamentally fails to analyze the severe safety risks on Guajome Lake Road, including its dangerous blind curves, narrow width, lack of shoulders, and long unpaved segments. This omission is unacceptable, especially given the project's projection of 830 new daily car trips on this already perilous route.
Dust and Visibility Hazards: With 800 feet of Guajome Lake Road remaining unpaved, the EIR neglects to evaluate how increased traffic dust will impair visibility, compromise driving safety, and pose health risks to equestrians and park users.

Wildfire Evacuation Deficiencies: The EIR makes no meaningful assessment of safe evacuation routes for residents, emergency responders, or equestrians (with horse trailers) during a wildfire. This is particularly alarming as portions of Guajome Lake Road do not even meet current fire code standards, and only a segment would be paved.

Ignored Equestrian/Pedestrian Safety: The EIR entirely ignores the safety risks to horses, riders, and pedestrians who regularly use Guajome Lake Road and adjacent trails, despite the inevitable surge in traffic and dust.

🐾 Regarding Wildlife and Habitat Connectivity:

Disrupted Wildlife Corridors: The EIR inadequately analyzes how this project would severely disrupt vital wildlife movement and habitat connectivity between Guajome Regional Park, Jeffries Ranch, and surrounding open space, crucial for regional biodiversity.

Inadequate Gnatcatcher Mitigation: While acknowledging impacts to the Federally-protected California Gnatcatcher habitat, the EIR's reliance on deferred and off-site mitigation is unsubstantiated. It fails to robustly demonstrate how these impacts would genuinely be reduced to less than significant levels.

Unsubstantiated Claims: The EIR's claim that off-site mitigation reflects a preference of the U.S. Fish and Wildlife Service lacks supporting evidence, undermining its credibility.

🐴 Regarding Equestrian/Land Use Incompatibility:

Erosion of Equestrian Overlay Protections: The project proposes waiving critical Equestrian Overlay protections. The EIR, however, completely fails to analyze the environmental and safety consequences of removing these protections, which were specifically established to preserve the area's rural and equestrian character.

Misleading Compatibility Claims: The EIR's assertion that the project is compatible with surrounding land uses is demonstrably false. Nearby properties consist predominantly of large-lot equestrian homes, making the proposed much smaller, higher-density lots a fundamental and incompatible alteration to the established community character.

💦 Regarding Water Quality and Impacts to Guajome Lake:

Insufficient Lake Assessment: Guajome Lake is an impaired waterbody, yet the EIR fails to establish a clear baseline for existing lake conditions or adequately analyze whether stormwater runoff from the project would exacerbate existing pollution.

Unmitigated Pollution Risks: The project's own stormwater plan concedes that some pollution controls do not fully meet performance standards. Despite this, the EIR concludes impacts would be less than significant without proposing additional, robust mitigation measures, which is unacceptable.

💩 Regarding Growth Inducement:

Underestimated Growth Impacts: The EIR significantly downplays the growth-inducing impacts of extending sewer infrastructure near Guajome Regional Park. This infrastructure could inadvertently facilitate future, unplanned development, leading to increased long-term environmental degradation in a sensitive area.

🏞️ Regarding the Scenic Park Overlay:

Violation of Overlay Purpose: The project site lies within the Scenic Park Overlay, intended to conserve and protect valuable natural resources near Guajome Regional Park. The EIR, however, fails to meaningfully analyze the project's compliance with this vital purpose.

Disregard for Scenic Value: The EIR inaccurately claims the area lacks scenic value, directly contradicting the project's proximity to protected parkland and the open views that City policy specifically intends to preserve.

💎 Regarding Vista & County-Specific Concerns and Inter-Jurisdictional Impacts:

Neglected General Plan Policies: The City's General Plan requires soliciting comments from the Guajome Regional Park Area Planning and Coordinating Committee for projects near the park. The EIR fails to disclose that this required consultation did not occur, yet still relies on findings of General Plan consistency. This undermines inter-agency coordination.

Unanalyzed Regional Impacts: Guajome Lake Road and surrounding access routes traverse multiple jurisdictions, including the City of Vista and unincorporated County areas. The EIR critically fails to analyze how project impacts would affect residents, emergency access, or evacuation beyond Oceanside's municipal boundaries.

Incomplete Cumulative Impact Analysis: The EIR also fails to adequately evaluate cumulative safety and environmental impacts on regional infrastructure and park users who rely on these cross-jurisdictional roadways. This includes the inexplicable omission of the Camino Largo housing project, which will add substantial traffic to Guajome Lake Road.

Approving this EIR in its current form would not only set a dangerous precedent but would inflict irreversible harm on a cherished natural resource and significantly diminish the quality of life for residents across multiple jurisdictions. We implore you to prioritize the health, safety, and environmental integrity of our community.
Therefore, I respectfully request that the City Council deny certification of the Environmental Impact Report (EIR) for the Guajome Lake Homes project. We demand a truly adequate environmental review that genuinely addresses these significant concerns before any further consideration of this development.

Thank you for your time, consideration, and dedication to serving all residents and protecting our precious natural environment.

Sincerely,
David William Oppenheim

Sent from my iPad

JIM DESMOND

SUPERVISOR, FIFTH DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470

January 27, 2026

Honorable Mayor Sanchez and City Councilmembers
City of Oceanside

Subject: Comments on the Guajome Lake Homes Project

Dear Mayor Sanchez and Councilmembers,

On behalf of San Diego County Supervisorial District 5, I respectfully urge the City Council to carefully consider all public comments before making a decision on the appeal for the Guajome Lake Homes project, scheduled for January 28, 2026. Community members have raised concerns to my office regarding potential impacts on traffic, biological resources, and equestrian activities.

While the County strongly supports efforts to increase housing availability, we're also committed to preserving and enhancing equestrian opportunities. This commitment is most recently reflected in our investment of $2 million to develop an equestrian staging area as part of the soon-to-be-constructed Bonsall Community Park and the larger San Luis Rey River Park project.

I trust the Council will weigh these considerations thoughtfully and make the decision that best serves the residents of Oceanside.

Thank you for your time and opportunity for comment.

Respectfully submitted,

Jim Desmond
Supervisor, 5th District
County of San Diego

Stephanie Rojas

From: DIANE HAWKINS <5roadrunners@cox.net>
Sent: Wednesday, January 28, 2026 11:48 AM
To: City Council
Cc: Undisclosed Recipients
Subject: Request to reconsider Guajome Park high density housing project

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Dear Mayor and City Council Members, My name is Diane Hawkins and I am a 35 year resident of Oceanside. I am writing to respectfully urge you to reconsider the proposed high-density housing
project of 83 homes on acerage adjacent to the Guajome County park and lake that serve as a designated wildlife habitat and horse trails. This area adjacent to the park is not an ordinary parcel of land. It functions as a critical buffer for wildlife movement,
water quality protection for the lake, and open-space relief for residents who rely on the park for recreation and environmental balance. A density of more than 10 homes per acre directly adjacent to the park risks permanent disruption to habitat connectivity,
increased runoff into the lake, traffic and noise impacts on the park, and long-term strain on local infrastructure. I am not opposed to housing, nor to responsible development. However, I strongly encourage the Council to consider a lower-density alternative
that better aligns with the environmental sensitivity of this location and the housing that would surround this development. A reduced number of homes would still allow development while preserving the integrity of the wildlife habitat, protecting the lake,
and respecting the public investment already made in the county park. Once this land is fragmented, it cannot be restored. The decision before you today will have lasting consequences far beyond the immediate housing yield. Thoughtful planning now—by scaling
back density—can balance housing needs with environmental stewardship and quality of life for current and future residents. Thank you for your time, consideration, and service to our community! Respectfully Diane Hawkins

Yahoo Mail: Search, Organize, Conquer

CleanEarth4Kids.org

January 28, 2026

RE: Deny EIR Certification for Guajome Lake Homes

Mayor Sanchez and Oceanside City Council,

CleanEarth4Kids.Org opposes the proposed certification of the Environmental Impact Report (EIR) for Guajome Lake Homes.

The EIR fails to adequately analyze how the project would disrupt wildlife movement and habitat connectivity, and does not document the impacts on the Guajome Regional Park, Jeffries Ranch, and other nearby areas. The submitted EIR relies on deferred and off-site mitigation, which would do nothing to reduce local environmental impacts.

The Guajome Regional Park and Jeffries Ranch areas must be treated with the utmost respect to preserve and protect threatened and vulnerable species.

Proceeding with this project without a proper EIR would risk the health and safety of pedestrians and native wildlife, including threatened species like the Coastal California Gnatcatcher. Over 186 species of migratory birds use the Guajome Regional Park as a sanctuary before continuing their journey.[1]

The EIR's reliance on inaccurate mitigation claims will ultimately lead to dire consequences that could have been avoided, including numerous health and safety risks as well as significant disruption to important native wildlife species.

Wildlife Harm

Wildlife in our region and beyond are acutely vulnerable to pesticide contamination, which occurs through multiple pathways, including fields, streets, parks, lawns, waterways, spray drift, soil residues, and the food chain.

Pesticides have pervasive negative effects across ecosystems,[2] harming plants, insects, birds, fish, and mammals, not just target pests by reducing growth, reproductive success, and survival rates, and disrupting critical ecological interactions that sustain biodiversity.

It is critical to protect the environment and biodiversity. Scientists have confirmed that Earth is experiencing the sixth mass extinction, a "biological annihilation" of the diverse species on our planet.[3]

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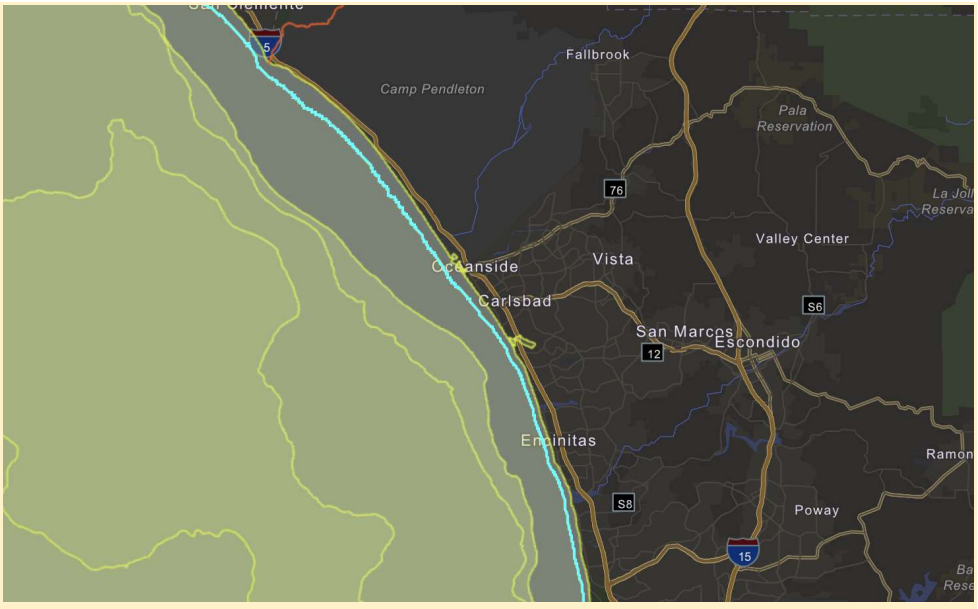
[1] https://www.tclf.org/guajome-regional-park
[2] https://phys.org/news/2025-02-global-pesticides-major-contributor-biodiversity.html#
[3] https://www.theguardian.com/environment/earths-sixth-mass-extinction-event-already-underway

The coastal area around Oceanside is marked as Essential Fish Habitat (EFH) for krill species, finfish, other coastal pelagic species, which are smaller aquatic species that live near the coast, and groundfish.[4] Toxins in runoff are well known to offset the ecosystem balance of coastal regions, and toxic chemicals can significantly harm oceanic species. Some observed damages include behavioral changes, premature death, and inhibition of important enzymes.[5]

EFH (Essential Fish Habitat) Map



The Lower San Luis Rey Watershed is especially, but not only, disturbed by the pollutants selenium, chloride, phosphorus, total nitrogen, and toxicity, as well as bacteria and total dissolved solids.[6] Mentioned as sources of these pollutants are septic systems, urban runoff, domestic animals, livestock, orchards, and agriculture.

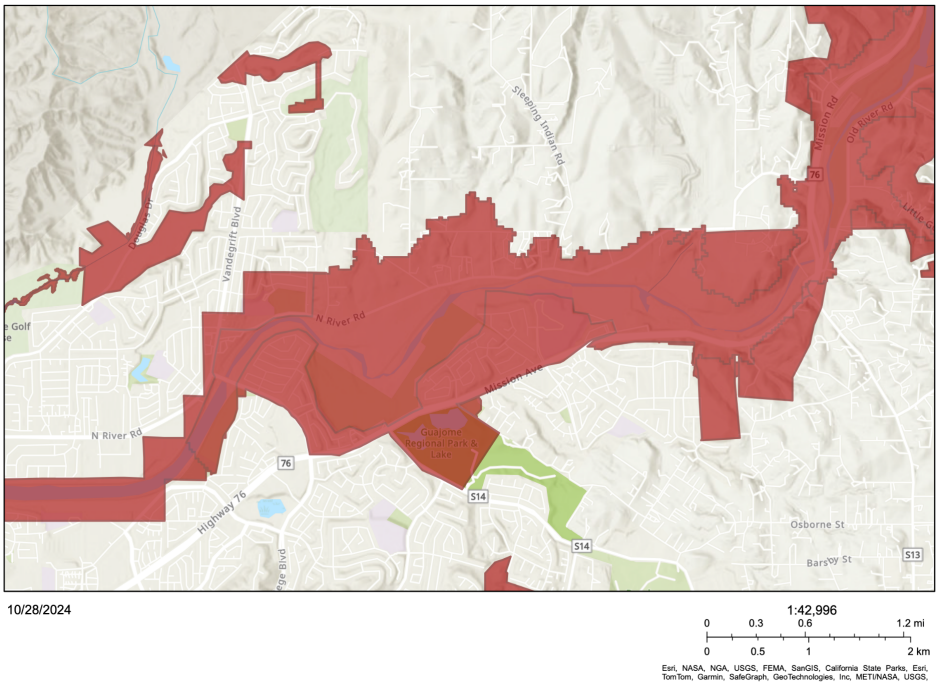
According to Project Clean Water, the San Luis Rey River supports habitats for species of concern, such as the orange-throated whiptail, the Western skink, and the California pocket mouse.[7] Additionally, the USFWS has marked critical habitats for the Arroyo Toad, the Least Bell's Vireo, and the Southwestern Flycatcher (see notes and map below).

These critical habitats are located directly adjacent to the fields.[8] The San Luis Estuary, which is composed of wetlands that the San Luis Rey River runs through, also provides 142 acres of habitat for species of concern such as the Southwestern pond turtle and the Belding's savannah sparrow. Many of these species are threatened by the pollution from agricultural runoff. The concern of weather-based

[4] https://maps.fisheries.noaa.gov/portal/apps/webappviewer
[5] https://www.beyondpesticides.org/programs/wildlife/fish
[6] https://projectcleanwater.org/watersheds/san-luis-rey-wma/#
[7] https://projectcleanwater.org/watersheds/san-luis-rey-wma/
[8] https://www.arcgis.com/apps/mapviewer/services.arcgis.com//USFWS_Critical_Habitat

pollution, such as runoff or flooding, is an issue that the San Luis Rey River is facing.

USFWS Critical Habitat Map



Local Species Under Threat

Amphibians:

The extent of the effect of PFAS on amphibian species can vary and, unfortunately, is not well studied for most species. However, generally, it has been observed that forever chemicals can impact body size and condition and the speed of development of amphibians.[9] Additionally, only a small amount of PFAS in water is necessary to negatively impact species. It has been found that only 10 micrograms of PFAS per liter of water can lead to a halt of development, leading to metamorphosis at smaller sizes.[10] Additionally, PFAS are persistent in amphibians' bloodstream and can affect thyroid function.[11]

Arroyo Toad

The arroyo toad (*Anaxyrus californicus*) has been listed as endangered since 1994. According to the USFWS online database, the Guajome Park and San Luis Rey River areas are critical habitat. The species faces a variety of threats, including agricultural development. Its needed habitat is clean, shallow, narrow, slow-moving waters and riparian areas.[12] These conditions are met in this area. Arroyo toads are porous

[9] https://www.usgs.gov/news/state-news-release/toxicity-forever-chemicals-varies-among-amphibian-species
[10] https://www.purdue.edu/newsroom/widespread-chemical-contaminants-stunt-growth-of-amphibians
[11] https://pmc.ncbi.nlm.nih.gov/articles/PMC9314107/
[12] https://www.fws.gov/species/arroyo-toad-anaxyrus-californicus

amphibians, meaning that they absorb necessary water and nutrients through their skin. These amphibians are therefore directly affected by contaminated runoff into their already fragile ecosystems, as contaminants can restrict and damage the toad's ability to absorb nutrients properly.

California Red-Legged Frog

The California red-legged frog (*Rana draytonii*) has been listed as endangered since 1996. One of the biggest threats the species faces is habitat loss and alteration. California red-legged frogs rely on water sources like the San Luis Rey River for breeding, temperature regulation, etc. USFWS has designated an area directly adjacent to the West Coast Tomato Growers fields as a critical habitat for endangered species.

Reptiles:

Research indicates bioaccumulation of PFAS can disrupt the endocrine system of reptiles and potentially cause changes to eggs, including a decreased mass or a decrease in lipid levels in yolk.[13] Additionally, PFAS are linked to cancer in reptiles and can cause deformities in hatchlings that could shorten their life expectancy. [14] PFAS can also weaken immune systems and make reptiles more susceptible to diseases, which also shortens their life expectancy.[15]

Western Skink

The lizard species Western skink (*Plestiodon skiltonianus*) prefers wooded areas and grasslands. Luckily, this species is listed as stable, and there are no limiting threats as of right now. However, it is marked on the IUCN red list and has been mentioned as a species of concern.[16] Project Clean Water identified the species to have populations relying on the ecosystem provided by the San Luis Rey River. Including species of less concern is vital to protect the ecosystem's biodiversity. Further encroachment and contamination of Western Skink habitats will have a destabilizing effect on the species.

Orange-Throated Whiptail

The Orange-throated whiptail (*Aspidoscelis hyperythra*) is a lizard species that is listed on the California Species of Concern. The species inhabits various habitat types, including riparian areas and coarse soils, which may be found near the proposed construction area.[17] According to Project Clean Water, populations are reliant on the San Luis Rey River. In California, the species is threatened by

[13] https://www.sciencedirect.com/science/article/abs/pii/S0166445X24000778
[14] https://www.sciencenews.org/article/forever-chemicals-pfas-health-turtles
[15] https://news.mongabay.com/2023/09/pfas-forever-chemicals-harming-wildlife-the-world-over-study/
[16] https://www.iucnredlist.org/species/64240/12757706#habitat-ecology
[17] https://www.iucnredlist.org/species/4996/11107755#habitat-ecology

fragmentation and disturbance through urbanization and agriculture. Overdevelopment of agriculture throughout and adjacent to habitat zones poses the threat of increased runoff, leading to disruptions in the survival of the orange-throated whiptail.

Birds:

Migration is an incredibly vulnerable time for birds. Guojome Regional Park is visited by many migratory birds over the seasons for its ponds.[18] Providing shelter for migratory birds is important because they provide benefits such as pest control, seed dispersal, and pollination of plants.[19] The loss of stopover sites such as the Guajome Regional Park creates danger for many bird species since it lessens safe spaces to feed, mate, and take rest.[20]

Least Bell's Vireo

The reason why the least bell's vireo (*Vireo bellii pusilus*) is listed as endangered is because of habitat degradation and loss, specifically through agricultural practices affecting riparian zones.[21] This is the case here, as this species has a critical habitat directly adjacent to the San Luis Rey River. Since the diet of the least bell's vireo mainly includes arthropods, the species is especially at risk of bioaccumulating PFAS through the food chain.[22]

Southwestern Willow Flycatcher

The Southwestern willow flycatcher (*Empidonax traillii extimus*) has been listed as endangered since 1995. Its biggest threat is the degradation of riparian areas.[23] The species likes to inhabit densely vegetated riparian areas, and populations are reliant on the San Luis Rey River.

Coastal California Gnatcatcher

Coastal California gnatcatcher (*Polioptila californica californica*) is a small nonmigratory bird species that is only found in coastal Southern California, Baja California, and Mexico. The birds rely on coastal sage scrubs, which grow largely in areas that have recently been heavily developed for urban and agricultural use. Due to this type of habitat loss, the species has been listed as endangered since 1993.[24]

California Least Tern

The California least tern (*Sterna antillarum browni)* is a small seabird that is found

[18] https://www.sdparks.org/content/sdparks/en/park-pages/Guajome.html
[19] https://www.usgs.gov/centers/norock/science/ecology-behavior-and-conservation-migratory-birds
[20] https://sciencemediacentre.es/en/migratory-birds-how-they-survive-anthropogenic-world
[21] https://www.fws.gov/story/least-bells-vireo
[22] https://cfpub.epa.gov/si/si_public_record_Report.cfm?dirEntryId=357537&Lab=CC
[23] https://www.fws.gov/species/southwestern-willow-flycatcher-empidonax-traillii-extimus
[24] https://www.fws.gov/species/coastal-california-gnatcatcher-polioptila-californica-californica

only along the California and Mexico coasts. These birds nest in colonies close to shoreline areas. Today, the species is considered endangered because its historical nesting locations have been disturbed or eliminated through urban development. San Diego County is one of three counties with the largest concentrations of breeding pair nests. It would be disastrous for the California least tern and their breeding habitats if harmful chemicals were introduced into the San Diego County shoreline ecosystem via runoff, which could impact the California least tern through bioaccumulation in the food chain.[25,26]

California Pocket Mouse

Similar to the Western skink, the California pocket mouse (*Chaetodipus calidornicus*) has populations reliant on the San Luis Rey River. Its preferred edge habitats are between shrubs and semi-open areas; however, it can be seen in deserts and coastal scrub habitats.[27]

Aquatic Animals:

Southwestern Pond Turtle

The Southwestern pond turtle (*Actinemys pallida*) has been proposed to be listed as threatened and is listed as a species of concern by the California Department of Fish and Wildlife. It has been identified that the species inhabits the San Luis Estuary, and its range is marked throughout Vista.[28] The species uses a variety of ecosystems, including wetlands, rivers, creeks, lakes, and ponds, to forage, regulate their temperature, and for shelter.[29] PFAS has gravitating negative effects on turtles, including changes in amino acid and lipid metabolism, production of energy, and oxidative stress responses. Additionally, impacted females may produce eggs with altered composition of magnesium to calcium ratios, which impacts the strength of the shells. The yolk and hatchlings of affected eggs may also show a higher likelihood of deformities, and recruitment is generally lower in impacted areas.[30]

Southern Steelhead Trout

Southern steelhead trout (*Oncorhynchus mykiss*) is a migratory rainbow trout with populations depending on the San Luis Rey River. Southern steelhead trout look very similar to traditional steelhead trout, but with longer, more streamlined bodies that have evolved to pass through California's characteristically shallow streams. The subspecies has been considered critically endangered since 1997 and is in danger of complete extinction within the next 25-50 years. Threats like the construction of

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[25] https://www.cdpr.ca.gov/docs/endspec/espdfs/ca_least_tern.pdf
[26] https://www.biologicaldiversity.org/publications/papers/bayareareport.pdf
[27] https://www.iucnredlist.org/ja/species/4329/115068220
[28] https://ecos.fws.gov/ecp/species/4768
[29] https://lpfw.org/our-region/wildlife/southwestern-pond-turtle/
[30] https://www.sciencedirect.com/Thefindingsrevealsignificantmetabolic,indicativeofearlydiseaseprogression.

man-made dams and the distribution of traditional fish passages have decimated Southern steelhead trout population counts over recent years.[31] Already, these trout are suffering due to human activity; introducing run-off chemical waste into the San Luis Rey River will only expedite the process of their extinction. PFAS bioaccumulates fast in fish species, especially larger species like salmon. Because salmon are harvested for human consumption, bioaccumulation in Southern steelhead trout can pose risks for humans. Eating one fish can equal the intake of water with high levels of PFAS for a month.[32] The effects on trout are similar to those of other species, including humans. PFAS may damage thyroid activity and negatively impact metabolism, development, and reproduction.[33]

Deny EIR certification for Guajome Lake Homes

CleanEarth4Kids.org asks you to reject the proposed EIR and insist on an accurate and comprehensive EIR for this project.

Our Children's Health and Future Depend on the Actions We Take Today!

Sincerely,

Suzanne Hume
Educational Director and Founder
S@CleanEarth4Kids.org
CleanEarth4Kids.org

[31] https://www.fws.gov/media/freshwater-fish-america-steelhead-trout
[32] https://www.scientificamerican.com/pfas-found-in-freshwater-fish-yet-most-states-dont-warn-residents/
[33] https://www.wcl.org.uk/pfas-pollution-warning-signal-in-freshwater-fish.asp

Stephanie Rojas

From: Jonathan Frankel <jfrankel@rincongrp.com>
Sent: Wednesday, January 28, 2026 12:11 PM
To: Manuel Baeza
Cc: Kimberly Foy; Darlene Nicandro; City Clerk; Barbara L. Hamilton
Subject: Guajome Lake Homes - Responses to Late Comments
Attachments: 2026.01.28_ Responses to late comments.pdf

EXTERNAL MESSAGE: Use caution when opening attachments, clicking links, or responding. When in doubt, please contact CustomerCare@oceansideca.org

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Hi Manny,

For the record, attached please find responses to the late comments received from the appellant Ms. Jacobs and Preserve Calavera.

Please confirm that these have been received and transmitted to the City council for their review.

Thank you,

Jonathan Frankel
Vice President, Forward Planning
Rincon Homes
5315 Avenida Encinas, Suite 200
Carlsbad, CA 92008
Direct: 925-708-3638
www.rincon-homes.com

Responses to Late Comments

Various letters and comments addressing the Guajome Lake Homes Project and its Final EIR were submitted in advance of the public hearings on the project. These comments generally cover the following issues and topic areas:

- Air Quality
- Biological Resources
- Greenhouse Gas Emissions
- Hazards/Safety (Fire/ Evacaution)
- Hydrology/Water Quality
- Land Use/Planning
- Recreation
- Transportation
- Cumulative Impacts
- Growth Inducement, Project Description, and other CEQA Issues
- Density Bonus Law, the Housing Accountability Act, and City Inclusionary Ordinance

While there is no requirement that the City respond to letters submitted after the close of the noticed public comment period (Pub. Resources Code, §§21091(d) and 21092.5(c); CEQA Guidelines, §15088), the applicant and expert environmental consultants have nonetheless prepared responses to substantive environmental issues raised in such correspondence. Issues that were previously raised and addressed in the Draft EIR or Final EIR are not restated here, and where multiple late comments raise the same or substantially similar issues, those issues are responded to at their first occurrence in the City Council agenda packet. The responses also address all late comments submitted by Ms. Jennifer Jacobs, who appealed the Planning Commission's approval of the Project. These responses are provided as a courtesy and without waiving the position that no written response is required by CEQA or any other law.

Responses to Additional Comments on Air Quality

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that dust from increased daily vehicle traffic on an unpaved road would create visibility, health, and safety risks for motorists, equestrians, and trail users that are not adequately addressed through reliance on average air quality thresholds, and contends that CEQA requires analysis of these impacts.

In response, these air quality comments related to dust were addressed in the Final EIR, including Section 4.2, Air Quality and the Responses to Comments.

Response to Comment I2-5 addresses comments related to dust and road safety. (Final EIR, pp. 2-75.) Initially, Guajome Lake Road would be improved over the length of the property frontage and extending northwest to connect to Albright Street, approximately 1,200 linear feet. Road improvements would include 40-foot-wide curb to curb improvements, including a 5-foot parkway and a 5-foot sidewalk. The internal private road would be 28 to 32 feet wide with 5-foot-wide sidewalks (Draft EIR, p. 3-2). In addition, circulation and emergency access drives have been designed in consultation with Fire Department staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site (Draft EIR, p. 3-5). This would ensure adequate emergency access and safe driving conditions.

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

Project construction and operation dust impacts were also evaluated. In response to this comment about roadway dust, Draft EIR Section 4.2, Air Quality, and Appendix B. CalEEMod modeling for the project has been updated to include emissions calculations for project-generated vehicle travel along the 800-foot segment of unpaved Guajome Lake Road southeast of the project site. The revisions apply to Draft EIR Section 3.2.5, Project Design Features, and Draft EIR Section 4.2, Air Quality, with text additions and revisions shown in strikeout/underline in Chapter 3,

Errata, of the Final EIR. As indicated in Chapter 3, the revised modeling assumptions associated with fugitive dust related to project-related travel on this unpaved segment of Guajome Lake Road would result in an increase in PM_{10} and $PM_{2.5}$ emissions. However, emissions would remain below the SDAPCD threshold. Therefore, consistent with the analysis in the Draft EIR, impacts associated with project-generated operational criteria air pollutant emissions would remain less than significant with mitigation incorporated (Mitigation Measure [MM]-AQ-2).

While the applicable PM_{10} and $PM_{2.5}$ significance thresholds are health-based standards, they are designed to be protective of the public under conservative assumptions. The fact that project-related particulate matter emissions would not exceed these thresholds indicates that fugitive dust levels would remain low and would not be of sufficient intensity or duration to result in adverse health effects or hazardous visibility or safety conditions for motorists, equestrians, or trail users.

In addition, the speed limit on Guajome Lake Road is currently-- and would remain -- 25 miles per hour. With project implementation, speed limits within the project site would be regulated for the safety of both vehicular and pedestrian traffic. Review of the most recent available accident data (January 1, 2023 through December 31, 2023) from the Transportation Injury Mapping System (TIMS) shows no reported collisions on Guajome Lake Road in its current, unpaved condition. More broadly, while unpaved roads comprise a substantial portion of the roadway network nationally (~35%), they account for a small fraction of roadway fatalities (2%), indicating that unpaved roads are not inherently more dangerous simply because they are unpaved. (See also, Response to Late Transportation Comments.) Accordingly, the EIR reasonably concludes that dust generated by project-related vehicle trips on an unpaved roadway would not result in significant air quality, health, or related safety impacts.

Responses to Additional Comments on Biological Resources

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that the EIR inadequately analyzes biological resources impacts related to wildlife movement and habitat connectivity, including loss of linkage between Guajome Regional Park, Jeffries Ranch Preserve, and other areas, and improperly characterizes the project site as relatively isolated from other preserves. She further contends that the EIR fails to adequately analyze impacts to coastal California gnatcatcher dispersal habitat, relies on generalized or deferred mitigation, and improperly defers evaluation of off-site mitigation effectiveness to future federal consultation.

In response, these biological resources comments were addressed in the Final EIR, including Section 4.3, Biological Resources, the project's mitigation measures, and the Responses to Comments.

a. Wildlife Movement and Habitat Connectivity

As explained in Response to Comment A3-15, Section 4.3 of the Final EIR concluded the project would not result in a significant impact related to wildlife movement and habitat linkages because, "the riparian corridor, which would constitute the main area for wildlife movement, will not be impacted, and wildlife movement around and along the stream will not be restricted." (Final EIR, p. 2-57.) **Approximately 41 percent of the site – 6.92 acres – would be preserved in the northernmost portion of the site, which includes the riparian corridor**. (Final EIR, p. 2-64.)

Response to Comment A3-15 continued:

> Furthermore, the riparian corridor is fragmented, with portions entirely absent off-site, upstream and downstream of the site. The site is surrounded by development, which limits movement of larger mammals. Although relatively isolated from large undeveloped areas and other preserves, the Diegan coastal sage scrub supports coastal California gnatcatcher and likely serves as a stepping-stone for dispersing individuals and habitat for the resident pairs. Because of this, the site does not function as part of a larger, contiguous wildlife corridor. In addition, the project site is located outside the designated Wildlife Corridor Planning Zone outlined in the Subarea Plan[1] The project provides for buffers from the edge of development and the riparian corridor, which minimizes the potential for indirect impacts (see Section 4.3.4 of the Draft EIR). The existing house located within the Subarea Plan buffer will be demolished as a part of project construction. Per Subarea Plan requirements, all areas of non-native vegetation and developed areas within the buffer will be landscaped with native vegetation (MM-BIO-

> 2). Since the project would not directly impact any potential wildlife corridors and provides an adequate buffer between the development and the riparian corridor, the project would not substantially interfere with wildlife movement and impacts related to habitat movement were determined to be less than significant.
>
> (Final EIR, p. 2-57, footnote omitted.)

Response to Comment A3-16 further explains that the site and riparian corridor currently abuts existing residential developments to the north, east, and west. To the extent wildlife is currently using the northern boundary, project operation will consist of similar residential uses. The proposed buffer, fully shielded lighting, perimeter fencing, and other project design features will further minimize operational impacts.

The commenter is also referred to Responses to Comments A3-14, A3-17, I6-1, I14-5, and I14-6.[1]

b. <u>Gnatcatcher Dispersal</u>

Contrary to the comment, the EIR analyzes and adopts mitigation for impacts to coastal California gnatcatcher.

> The coastal sage scrub habitat on site supports nesting coastal California gnatcatcher. The proposed project would not result in the direct loss of any riparian habitat that is known to support least Bell's vireo or white-tailed kite but would result in the permanent loss of 1.25 acres of habitat utilized by coastal California gnatcatcher and 8.29 acres of potential foraging habitat for white-tailed kite (Impact BIO-2). Direct impacts to this habitat would be mitigation through implementation of MM-BIO-1, which would provide for the preservation of high-value habitat at a conservation bank.
>
> To further ensure that special-status wildlife are not impacted by initial clearing/grubbing, MM-BIO-3 through MM-BIO-10 would be implemented, which would involve temporary construction fencing, environmental awareness training, breeding season avoidance, BMPs for construction, and nesting bird surveys and avoidance measures. Because the Oceanside Subarea has not be adopted, take of habitat for coastal California gnatcatcher would need to be granted through the Section 10 consultation process with the USFWS (MM-BIO-11).
>
> (Section 4.3.4, Impact Analysis [Draft EIR, p. 4.3-19])

Regarding wildlife movement, the EIR acknowledges, "Although relatively isolated from large undeveloped areas and other preserves, the Diegan coastal sage scrub supports coastal California gnatcatcher and likely serves as a stepping-stone for dispersing individuals and habitat for the

[1] This response also addresses the same issue raised, among others, in correspondence from Chatten-Brown Law Group dated January 27, 2026, at pp. 13-14.

resident pairs." (Section 4.3.4, Impact Analysis [Draft EIR, p. 4.3-21].) However, because "the entire riparian corridor to the north of the project would remain in its current state," the project would not substantially interfere with wildlife movement. (*Id.,* See also, Response to Comment A3-15 [Final EIR, p. 2-57.))

c. Mitigation is Appropriate

The EIR identifies appropriate mitigation for impacts to Diegan coastal sage scrub. As explained in Response to Comment A3-23:

> Off-site mitigation at the Quarry Creek Mitigation Site is proposed and was negotiated with permitting regulatory agencies as their preferred mitigation alternative. As such, no on-site mitigation is proposed. However, the BTR, included as Appendix C, explains that MM-BIO-1 mitigates for impacts to Diegan coastal sage scrub at a 2:1 mitigation ratio. This includes Diegan coastal sage scrub that would be impacted by fuel modification, as explained above. Further, ratios for habitat-based mitigation shall be finalized during the Section 10 consultation process with USFWS (MM-BIO-11). Additionally, since there is no Implementing Agreement between the City and the wildlife agencies for the Oceanside Subarea Plan, the mitigation ratios provided in the plan are used as a guidance, and the City has discretion as to when they require mitigation.
>
> Offsite habitat conservation and/or enhancement has long been recognized as appropriate mitigation pursuant to CEQA. Refer to, e.g., CEQA Guidelines, § 15370 (e), providing that mitigation includes, "[c]ompensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements." See also, *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 794 [upholding gnatcatcher mitigation that provided for on-site or off-site preservation of similar habitat at a 2:1 ratio], *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1038-1040 [upholding mitigation requiring purchase of habitat reserves at less than 1:1 ratio where additional mitigation could lead to a "reduction in levels of development," and harm the public through "a shortage of housing supply."]; *Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 528 [finding "sufficient evidence in the record that conservation of habitats through easements and other methods would mitigate the impact on the biological resources to a less than significant effect".])
>
> (Final EIR, p. 2-60.)

Said differently, the USFWS, as the permitting agency, has identified the off-site Quarry Creek site as the preferred mitigation location for impacts to coastal California gnatcatcher habitat based on factors including habitat continuity, adjacency to conserved lands, acreage, connectivity, and overall biological functionality. In contrast, on-site mitigation would be less effective due to the fragmented nature of on-site habitat and the lack of sufficient area to achieve required mitigation ratios while accommodating the proposed housing. Selection of the off-site mitigation location is consistent with CEQA.

II. Catherine Muzzy Email (January 20, 2026)

The commenter asserts the site may contain suitable habitat for Crotch's bumble bee and that the Draft EIR was shown to be incomplete for only adding MM-BIO-9 in response to comments. The commenter further asserts that, "Comparable projects in North County have been required to redesign developments to protect this species."

The refinement of the analysis and addition of mitigation in response to agency comments reflects CEQA's iterative review process and demonstrates that the CEQA process functioned as intended.

The commenter is referred to Response to Comment A3-24 in the Final EIR. As described, the bee has a low potential to occur within the non-native grasslands onsite that make up the majority of the proposed project's footprint. This is because these areas are regularly mowed, limiting the potential for floral resources necessary for the species. There is a moderate potential for them to occur within the coastal sage scrub located onsite. However, 6.92 acres in the northern portion of the site would be preserved habitat area. MM-BIO-9 has been added to ensure impacts to the Crotch's bumble bee remains less than significant. MM-BIO-9 has been updated to require a habitat assessment and three focused preconstruction surveys for the species if Crotch's bumble bee is legally protected under CESA as a Candidate or Listed species at the time ground-disturbing activities are scheduled to begin. The preconstruction surveys are most appropriate because bumble bees move nest sites each year, changing their nest and foraging locations. Appendix C and Section 4.3, Biological Resources, of the Draft EIR, have been updated to describe that an Incidental Take Permit (ITP) could be required if take of Crotch's bumble bee is present on the site and cannot feasibly be avoided (refer to Chapter 3, Errata, of the Final EIR). The appropriate consultation and other steps described will be taken if Crotch's bumble bee is detected during the preconstruction surveys to ensure avoidance and minimization of impacts to the species to the satisfaction of CDFW, and focused surveys are not necessary prior to finalizing the CEQA document.

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

(February 1 through October 31). Thus, MM-BIO-8 will similarly reduce the risk of impacts to nesting Crotch's bumble bee.

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

III. Cheri Bell Email (January 19, 2026)

The commenter asserts that approval of the project would eliminate one of the last open areas available for wildlife, including turtles, coyotes, raccoons, and skunks.

The Draft EIR adequately addresses biological resources in Section 4.3, Biological Resources, and the Biological Technical Report (Appendix C). The Draft EIR does not identify turtles as occurring on the project site or in the project vicinity. The proposed project site does not contain ponded areas with basking sites. Coyotes, raccoons, and skunks are common wildlife species and are not special-status species under CEQA. The biological analysis appropriately focuses on special-status species, sensitive habitats, and wildlife movement, and concludes that impacts would be less than significant with mitigation. The Project would also preserve approximately 6.92 acres of the site as open space, which would remain available for use by common wildlife species.

IV. San Diego Bird Alliance Letter (January 27, 2026)

The commenter asserts that the EIR acknowledges impacts to coastal California gnatcatcher (CAGN) habitat but improperly relies on deferred and off-site mitigation, including the Quarry Creek mitigation site, and fails to demonstrate that impacts would be reduced to less than significant levels given regional habitat loss and recent wildfires. The commenter further asserts that the Project would adversely affect least Bell's vireo (LBVI) habitat near a core population in the San Luis Rey area and that any habitat loss in proximity to this area could further threaten the species' recovery.

Comments regarding coastal California gnatcatcher are addressed in detail above in response to Ms. Jacobs' January 22, 2026 letter and are incorporated here by reference. As explained therein, the EIR evaluates the Project's impacts to CAGN habitat and concludes those impacts would be mitigated to less than significant levels through implementation of MM-BIO-1, which provides for off-site compensatory mitigation at a 2:1 ratio. The commenter's references to recent wildfires in Los Angeles and regional habitat loss outside the project area do not alter this conclusion, as CEQA does not require a project to mitigate for environmental impacts it did not cause or contribute to, and project-related impacts would be reduced below significance.

With respect to least Bell's vireo, the EIR concludes that the Project would *not* result in direct impacts to riparian habitat known to support the species because the riparian corridor would

remain intact and buffered from development (Draft EIR, Section 4.3.4; Final EIR, Response to Comment A3-15). The project would avoid development in the northernmost portion of the site, which includes the riparian corridor, thereby preserving approximately 6.92 acres. Impacts to least Bell's vireo were determined to be less than significant. Further, MM-BIO-2 through MM-BIO-11 would mitigate for construction and indirect impacts via temporary construction fencing, environmental awareness training, construction best management practices, work hour limitations, breeding season avoidance, preconstruction surveys (including nesting bird surveys), biological monitoring, appropriate landscaping and lighting, and other measures.

Responses to Additional Comments on Greenhouse Gas Emissions

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that the EIR's greenhouse gas analysis is inadequate because it relies on CAP checklist screening rather than a project-level analysis, particularly given the project's alleged inconsistency with the General Plan. She further contends that the EIR fails to evaluate consistency with the 2022 CARB Scoping Plan or to demonstrate how the project would achieve required greenhouse gas reductions over time.

In response, these GHG comments were addressed in the Final EIR, including Section 4.7, Greenhouse Gas Emissions and the Responses to Comments.

a. CAP Consistency and CARB Scoping Plan

The comments concerning CAP consistency and consistency with CARB's Scoping Plan are addressed at Response to Comment O2-65:

> [A] as the lead agency, the City has the discretion to choose the significance threshold for discretionary projects. The City's Climate Action Plan (CAP) relies on a screening threshold based on land use size and a CAP (2019) Consistency Checklist to determine whether a project's emissions would be consistent with GHG emissions estimated within the City's CAP. Lead agencies under CEQA are not required by CARB to use the goals set in the CARB Scoping Plan as the threshold of significance but are instead vested with the discretion to rely on the appropriate significance criteria or threshold recommended by the applicable air district or other lead agencies. Pursuant to CEQA Guidelines sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. As discussed in Section 4.7 Greenhouse Gases, the City of Oceanside has adopted a CAP, which was prepared in accordance with the requirements within CEQA Guidelines Section 15183.5 and was subject to environmental review. A plan for the reduction of GHG emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. The CAP demonstrates how the City will align with state GHG emissions reductions targets for 2020, 2030, 2035, 2040, and 2050. Projects consistent with the CAP, as shown through the City's Checklist, are consistent with the City's GHG reduction measures and, therefore, also align with state goals, plans, and policies. The proposed project demonstrates consistency with the CAP Consistency Checklist, as detailed in Section 4.7 of the Draft EIR, and would therefore result in less than significant impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As such, evaluating compliance with the CARB 2022 Climate Change Scoping Plan would not change the impact determinations

in Section 4.7, which concluded that the proposed project would not generate GHG emissions that have a significant impact on the environment because the project was determined to be consistent with the City's CAP (Table 4.7-5); therefore, no change is required.

In response to the comment alleging inconsistency with the General Plan, the Climate Action Plan (CAP) Checklist applies to projects that "conform to current land use and zoning standards." As demonstrated in Draft EIR Chapter 3 (Project Description) and Section 4.10 (Land Use and Planning), the proposed project is consistent with the City's General Plan land use designation and zoning applicable to the project site, which designate the site for Single Family Detached Residential (SFD-R) and Single-Family Residential- Scenic Park Overlay-Equestrian Overlay.

As analyzed in the EIR, the City's current zoning standards include its implementation of the State Density Bonus Law through Zoning Ordinance Section 3032. Under this framework, qualifying housing projects are entitled to increased density, incentives, and to corresponding waivers of development standards where necessary to accommodate the project and any density bonus. While the project cannot physically comply with all base development standards absent application of the Density Bonus Law, the requested waivers are part of the City's adopted zoning standards.

Moreover, the Housing Accountability Act, Gov. Code, §65589.5, subd. (j)(3), expressly provides that receipt of Density Bonus Law benefits "shall not constitute a valid basis on which to find a proposed housing development project is inconsistent, not in compliance, or not in conformity, with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision specified in this subdivision." Essentially, the "waived zoning standards are not 'applicable'" for purposes of determining "consistency with applicable general plan designations and policies and applicable zoning designations and regulations." (*Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1348-1349; *West Adams Heritage Association v. City of Los Angeles* (2024) 106 Cal.App.5th 395, 419-420.)

The project further completed the CAP Checklist to ensure emissions targets would be achieved. Among other things, as detailed in the EIR and Appendix B, Air Quality and Greenhouse Gas Emissions Technical Report, the project includes the use of on-site renewable energy through solar photovoltaic (PV) roof tiles, and canopy coverage and permeable surface area that meets requirements outlined in the City's Zoning Ordinance. See Table 16 of Appendix B of the Final EIR for a full analysis of the CAP Consistency Checklist and Project Consistency.

See also, Response to Comment O2-73, which explains that, as relevant to the Checklist's VMT criterion, the project was demonstrated to result in minimal VMT impacts through screening out under the City's Traffic Impact Analysis Guidelines.

Thus, the proposed project, including the applicable density bonus and associated waivers provided for under the City's zoning framework, conforms to the City's current land use and zoning standards for the project site and is therefore appropriately screened using the CAP Checklist. [2]

[2] This response also addresses the same issue raised, among others, in correspondence from Chatten-Brown Law Group dated August 11, 2025, at pp. 6-8.

Responses to Additional Comments on Hydrology/Water Quality

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that the EIR inadequately analyzes hydrology and water quality impacts by failing to establish a meaningful baseline for existing conditions at Guajome Lake, relying instead on regulatory impairment listings. She further contends that the EIR improperly concludes impacts would be less than significant despite the project's Stormwater Quality Management Plan allegedly admitting a BMP does not fully satisfy pollutant control performance standards, without evaluating residual impacts or identifying additional mitigation.

In response, these Hydrology and Water Quality-related comments were addressed in the Final EIR, including Section 4.9, Hydrology and Water Quality, 4.17, Utilities and Service Systems, and the Responses to Comments.

a. The Baseline Discussion was Appropriate for the Analysis

As described in Draft EIR Section 4.9 (Hydrology and Water Quality), the EIR identifies existing surface water quality conditions using the State Water Resources Control Board's Clean Water Act Section 303(d) impaired waters listings. Section 303(d) requires that the state develop a total maximum daily load (TMDL) for each of the listed pollutants as a means to alleviate the impairments within water bodies' surface water. As shown in Table 4.9-1, Guajome Lake is listed as impaired due to eutrophic conditions. This regulatory listing reflects the State's determination of existing water quality conditions and provides the baseline used in the EIR to evaluate potential project-related water quality impacts.

The analysis considers whether the project would violate any water quality standards in Section 4.9.4 based on these identified impairments. As described therein, the project will comply with the San Diego Municipal Storm Water Permit Order No. R9-2013-0001 and implement pollution control and BMPs during project construction and operation. Compliance with applicable water quality and stormwater regulations and the City's BMP Design Manual would prevent pollutants from entering the regions storm drain system, in compliance with all applicable requirements of the San Diego Regional Water Quality Control Board and City of Oceanside.

Regarding construction, the Draft EIR explains the project is required to comply with the NPDES SWRCB Construction General Permit Order No. 2022-0057-DWQ for stormwater discharges and general construction activities and to incorporate runoff controls and standard BMPs, such as regular cleaning or sweeping of construction areas and impervious areas. In compliance with the Construction General Permit Order 2022-0057-DWQ, a stormwater pollution prevention plan (SWPPP) would be prepared for the project that specifies BMPs that would be implemented during construction to minimize impacts to water quality. Surface drainage during project construction would be controlled through implementation of the Storm

Water Quality Management Plan (SWQMP) (Appendix I) and SWPPP and in accordance with NPDES regulations and provisions of the City's Grading and Erosion Control Ordinances.

Implementation of the Project would include maximizing pervious area onsite (approximately 39% pervious area) and providing for stormwater treatment for the pollutants prior to discharge from the development. The project's SWQMP (Appendix I) was prepared based on requirements set forth in Provision E.3 of the RWQCB's NPDES MS4 Permit that covers the San Diego Region (Order No. R9-2013-0001). The stormwater quality design was also prepared in accordance with the City's BMP Design Manual. The Draft EIR describes the project would implement permanent source control measures, which would include prevention of illicit discharges, storm drain signage, on-site storm drain inlets, future indoor and structural pest control, and landscape/outdoor pesticide use. Two biofiltration basins are proposed on the project site to provide stormwater treatment for the pollutants discharged from the development (Appendix H, Preliminary Hydrology Study). The project would be required to provide for implementation of ongoing maintenance of these features. Further, the project is required to maintain structural stormwater BMPs in accordance with the SWQMP Operations and Maintenance Plan and to provide documentation of annual maintenance verification to the City as required by the Regional MS4 Permit.

Additionally, the proposed landscaping throughout the project site would further stabilize soil, reducing erosion compared to the existing condition and as required by mitigation measure MM-BIO-3, would not "use plants that require intensive irrigation, fertilizers, or pesticides adjacent to the Preserve" and water runoff from landscaped areas would be directed away from the open space areas and contained and/or treated within the development footprint. Landscaping within the Subarea Plan buffers would also consist of native species.

b. <u>SWQMP Compliance Requirement Supports Less-Than-Significant Hydrology and Water Quality Impact Determination</u>

As described in Draft EIR Section 4.9 (Hydrology and Water Quality), the project would be subject to post-construction stormwater management requirements established under the Regional Water Quality Control Board's NPDES Municipal Separate Storm Sewer System (MS4) Permit for the San Diego Region (Order No. R9-2013-0001), including Provision E.3, and the City's BMP Design Manual.

The project's SWQMP (Appendix I) and Preliminary Hydrology Study (Appendix H) identify operational BMPs and stormwater management strategies that must be implemented, approved, and maintained as a condition of project approval. As discussed on page 4.9-9 of the Draft EIR, the project would be required to implement and provide ongoing maintenance of stormwater control features in accordance with the approved SWQMP, including compliance with the SWQMP Operations and Maintenance Plan and annual maintenance verification submitted to the City. In addition, construction and post-construction activities would be subject

to the General Construction Permit, preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), and required post-construction BMPs.

The comment appears to reference a remnant footnote contained in a draft spreadsheet and does not reflect the Project's required compliance with applicable stormwater performance standards and requirements. As described in Draft EIR Section 4.9, the project's SWQMP is subject to City review and approval and must comply with the requirements of the Regional MS4 Permit and the City's BMP Design Manual. If the proposed stormwater control measures were determined to be insufficient to meet applicable performance standards, the SWQMP would be required to be revised prior to project approval and permitting. Accordingly, implementation and ongoing maintenance of an approved SWQMP ensures that construction- and operation-related water quality impacts would be less than significant

Responses to Additional Comments on Hazards and Hazardous Materials

I. Jennifer Jacobs Letter (January 22, 2026)

The commenter asserts that the EIR inadequately analyzes evacuation feasibility and emergency access given constrained ingress and egress, wildfire risk, and reliance on future roadway improvements, and fails to address evacuation and emergency safety for equestrian and livestock uses requiring trailers and longer clearance times. The commenter also asserts the EIR does not analyze safety impacts to horses and riders that use Guajome Lake Road as part of the trail network.

In response, these Hazards and safety-related comments were addressed in the Final EIR, including Sections 4.8, Hazards, 4.18, Wildfire, 4.15, Transportation, 4.13, Public Services, and the Fire Protection Plan (Appendix O) and the Responses to Comments.

a. The Project is Designed for Adequate and Improved Evacuation Safety

Response to Comment I4-4 explains that the Project would not significantly impact emergency access or evacuation. The project would provide two access points for emergency responders along the southern boundaries of the project site along Guajome Lake Road. The project site access, including proposed road widths and connectivity, will comply with the City's roadway standards and California Fire Code (CFC) Section 503, including the looped internal road system designed to accommodate emergency vehicle access and residential traffic flow. The project is also consistent with Section D107.1 of the CFC, which addresses fire apparatus access roads for residential developments with one- or two-family dwellings, Section D107.1 states that developments with more than 30 dwelling units shall be provided with two separate access roads, unless certain exceptions apply (i.e. .when there are more than 30 dwelling units accessed from a single public or private fire apparatus access road and all dwelling units have an approved automatic sprinkler system). Consistent with Section D107.1 of the CFC, the project proposes two access points into and out of the development accessible via Guajome Lake Road and the project's proposed looped internal road system has been designed to accommodate emergency vehicle access and residential traffic flow.

The comment correctly notes the EIR acknowledges that Guajome Lake Road does not currently meet fire code standards, but that future project improvements would ensure compliance. Currently, Guajome Lake Road is an unpaved dirt road from Albright Street to just east of Old County Road. This area is currently not up to fire code standards, but as discussed in Draft EIR Chapter 3, Project Description, project implementation would include improvements along a portion of Guajome Lake Road (from Albright Road to the eastern edge of the project frontage, approximately 1,200 linear feet) to comply with City roadway and fire code standards.

Because the project site and surrounding area are **not located within a Very High Fire Hazard Severity Zone**, an evacuation plan is not required. However, in the event of an

emergency that requires evacuation, the event would be managed with the City's Genasys evacuation management software used to meter traffic combined with downstream intersection control to move traffic. In addition, the project would be required to implement a traffic control plan for construction activity in the public right- of-way to insure proper emergency access to the project site and surrounding area during project construction. The remainder of the project would not require the full closure of any public or private streets or roadways during construction or operations and would not impede access of emergency vehicles to the project site or any surrounding areas. Further, the project would provide all required emergency access in accordance with the requirements of the Oceanside Fire Department, as detailed in Draft EIR Draft EIR Sections 4.13, Public Services, and 4.15, Traffic and Circulation.

As discussed at Response to Comment I11-2, Draft EIR Section 4.13, Public Services, Section 4.18, Wildfire, and Appendix O, Fire Protection Plan Letter Report, explain that the project would have a less than significant impact on fire protection and emergency evacuation. As discussed in Appendix O, the proposed development would be substantially consistent with the Oceanside Fire Department's 5-minute response time goal and fully compliant with the National Fire Protection Association's national guideline of having a fire response time of 6 minutes and 30 seconds, 90% of the time. The anticipated response time is adequate to avoid a significant environmental impact and mitigation is not required. To provide additional clarification on emergency response times for the proposed project, text revisions to Section 4.13, Public Services, Section 4.18, Wildfire, and Appendix O are shown in strikeout/underline in Chapter 3, Errata, of the Final EIR. Further, the Oceanside Fire Department would be required to review and approve all final site plans for the project to ensure adequate site accessibility and response times and the project would be required to provide adequate site access and emergency access to maintain fire department response times. Additionally, the City has an established public facility development impact fee program (Municipal Code Chapter 32B and 32C) that requires new development to provide funds toward capital improvements for public services, including fire and emergency services. The project would be required to pay applicable developer impact fees in accordance with the City's requirements as well as the City of Oceanside Community Facilities District No. 2022-1 (Public Safety Services). Thus, should improvements be needed to address City response gaps, these fire mitigation fees would help fund such improvements when and where Oceanside Fire Department determines they are needed.

b. <u>The Project would Not Significantly Impact Evacuation of Equestrian or Livestock Uses</u>

The comment asserts that the EIR fails to consider potential evacuation and emergency safety impacts to equestrian and livestock uses. The project does not propose equestrian or livestock uses on-site. As described in Draft EIR Section 2.1.3 and shown on Figures 3-1 (Project Location) and 3-2 (Existing Project Site), the project site is bordered to the north and east by existing single-family residential development, to the south by an existing single-family lot at 2837 Guajome Lake Road, and to the west by Guajome Lake Road and Guajome Regional Park,

including the Willow Trail.. See Figure 3-1, Project Location, and Figure 3-2, Existing Project Site. While horses are kept on one property neighboring the site, surrounding land uses in the immediate vicinity of the project are predominantly single-family residential.

The EIR evaluated emergency access and evacuation conditions for the project area as part of the circulation, fire protection, and wildfire analyses. As discussed above and in Draft EIR Sections 4.18, Wildfire, 4.15, Transportation, 4.13, Public Services, and the Fire Protection Plan, the project would include roadway improvements along Guajome Lake Road and internal circulation designed to Fire Department standards, which would improve emergency access and evacuation conditions in the area. The project would not obstruct existing evacuation routes or emergency response access serving surrounding properties, including adjacent residential or equestrian uses. (See also, Response to Comment O2-42.)

Accordingly, the EIR reasonably concludes that the project would not result in significant evacuation or emergency access impacts for surrounding land uses, including properties that may support equestrian or livestock activities.

c. Trail Impacts to Equestrians along Guajome Lake Road.

In response to the comment asserting that the EIR fails to analyze safety impacts to horses and riders using Guajome Lake Road as part of an established trail network, Guajome Lake Road is not designated as an equestrian trail and is identified in the City's Circulation Element as a Collector Street (see Final EIR Section 4.15, Traffic and Circulation). The nearest designated equestrian trail access to Guajome Regional Park is located approximately 0.25 mile from the southwest corner of the project site. The project would not impede equestrian access to existing trail entry points, would not remove or alter any designated equestrian trails, and would not introduce barriers to access to Guajome Regional Park. Speed limits on Guajome Lake Road are currently—and would remain—25 miles per hour, and the road would be improved along the project frontage to include a sidewalk, further reducing any risk. Accordingly, the EIR reasonably concludes that the project would not result in significant safety impacts to equestrian riders or horses using existing trails or access points in the project vicinity.

II. Catherine Muzzy Email (January 20, 2026)

The commenter asserts that the Project will cause specific adverse impacts to public health and safety, including chemical exposure from pesticides and rat poison, and heightened wildfire risk due to project density and the use of fireworks.

In response, the Draft EIR adequately analyzes hazards and public safety impacts associated with the project. The project does not propose the use, storage, or application of pesticides, rodenticides, or other hazardous materials beyond those that may be associated with typical residential occupancy and landscape maintenance. As described in Draft EIR Section 4.8, Hazards and Hazardous Materials, extensive federal, state, and local regulations govern the

handling, storage, use, and disposal of hazardous substances, and compliance with these regulatory requirements would ensure that potential hazards related to hazardous materials would be less than significant. The Draft EIR therefore concludes that the project would not result in significant hazards or hazardous materials impacts and that no mitigation measures are required.

With respect to wildfire risk, the Draft EIR evaluates fire hazards and emergency response in Sections 4.13, Public Services, and 4.18, Wildfire, and relies on a Fire Protection Plan Letter Report (Appendix O) prepared for the Project. The project site is located within an area designated as a **Non-**Very High Fire Hazard Severity Zone, and the project would be required to comply with applicable City and state fire and building codes, including fuel modification requirements and other fire-safety design features. The Draft EIR concludes that compliance with these requirements would ensure wildfire-related impacts would be less than significant.

The project does not include or propose the use of fireworks, and fireworks are illegal to use in the City of Oceanside and throughout San Diego County unless part of a permitted professional display. Assertions that future residents may use fireworks or otherwise create new ignition sources is speculative and do not demonstrate a deficiency in the Draft EIR's analysis. CEQA does not require an EIR to speculate about hypothetical illegal future conduct of residents. Based on the analysis provided in the Draft EIR, no additional environmental review is required to address the concerns raised.

III. Chatten-Brown Law Group (January 27, 2026)

The commenter asserts that the EIR inadequately analyzes evacuation and emergency access by failing to include an evacuation time study, relying on Guajome Lake Road, portions of which are unpaved and not up to fire code standards, and effectively providing only a single means of ingress and egress. The commenter further contends that wildfire risks are understated because the Project's evacuation route may be used by residents from nearby moderate and high fire hazard severity zones, and references comments by Dr. Michael Tenhover alleging deficiencies in the fire and evacuation analysis.

The EIR adequately addresses wildfire risk, emergency access, and evacuation consistent with CEQA. As explained in Section 4.8, Hazards and Hazardous Materials, and the Fire Protection Plan, the Project site and surrounding area are not located within a Very High Fire Hazard Severity Zone, and therefore an evacuation time study is not required under applicable guidance. (Draft EIR p. 4.8-12, Final EIR pp. 2-339 to 2-340.) Response to Comment O2-137 addresses this comment, explaining that the project would provide two access points along the southern boundary of the project site along Guajome Lake Road. As discussed in Response to Comment I4-4, the project site access, including proposed road widths and connectivity and the proposed improvements to Guajome Lake Road, will comply with the City's roadway standards and California Fire Code (CFC) Section 503. Further, because all the proposed residences would include a fire sprinkler system, access from two directions is not required. The project would

provide all required emergency access in accordance with OFD requirements, as detailed in Draft EIR Sections 4.13, Public Services, and 4.15, Traffic and Circulation. In the event of an emergency requiring evacuation, the City uses the Genasys evacuation management software to evacuate precise streets and areas to help meter traffic combined with downstream intersection control to move traffic. This highly detailed and precise evacuation procedure minimizes roadway congestion and evacuation times.

The commenter's assertions regarding evacuation impacts associated with nearby fire hazard severity zones and potential use of evacuation routes by other residents are speculative and do not demonstrate a Project-specific impact. CEQA does not require an EIR to analyze hypothetical evacuation scenarios unrelated to the Project site or to prepare evacuation modeling absent substantial evidence that the Project would create or substantially worsen a wildfire evacuation hazard. As disclosed in the EIR, the Project would not substantially increase wildfire risk or impair emergency response or evacuation. See also the Errata to the Final EIR, Appendix O, Fire Protection Plan Letter Report. (Final EIR, pp. 3-84 to 3-89)

Finally, to the extent Dr. Tenhover's separately submitted comments dispute the conclusions of the EIR, disagreement with the methodology or conclusions of the analysis does not constitute substantial evidence of an inadequacy where, as here, the EIR relies on accepted standards, agency review, and expert analysis. Accordingly, the EIR's analysis of wildfire risk, emergency access, and evacuation is adequate, and no additional study is required.

Responses to Additional Comments on Land Use and Planning

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that the EIR inadequately analyzes land use impacts associated with the project's waiver of the equestrian zoning overlay, including compatibility with surrounding equestrian uses, community character, trail connectivity, rider safety, and adjacent park uses. She further contends that the EIR improperly evaluates land use context, fails to document required consultation with the Guajome Regional Park Area Planning and Coordinating Committee, and does not demonstrate consistency with General Plan Policy H governing development within the Guajome Regional Park Sphere of Influence or with the Scenic Park Zoning Overlay's resource protection purposes.

In response, each of these land use and planning comments was fully addressed in the Final EIR, including Chapter 3, Project Description, Table 3.3-1 Project Development Standards and Required Waivers, Section 4.1, Aesthetics, Section 4.10, Land Use and Planning, and the Responses to Comments.

a. Waivers of Equestrian Development Standards and Evaluation throughout the EIR

Regarding waivers of equestrian development standards and potential resulting impacts, Response to Comment O5-5 explains that the waivers are necessary because application of those standards would physically preclude development of the density bonus project. The physical environmental impacts of the housing development project, as designed with the requested waivers, have been evaluated throughout the EIR, including impacts related to air quality, noise, water quality, hazards and hazardous materials, recreation, wildfire, and other environmental topics. In addition, the EIR includes an extensive evaluation of the project's consistency with General Plan goals and policies, as summarized in Table 4.10-1, City of Oceanside General Plan Consistency Evaluation.

With respect to impacts on equestrian lots and uses, trail connectivity, and rider safety, the Responses to Comments explain:

> The requested waivers of Equestrian Overlay Standards would not affect nearby horse owners. The intent of the equestrian overlay is to provide for recreational opportunities and establish design standards and criteria that accommodate keeping and protection of horses on private property. There are no equestrian trails that cross the project site currently and no access point into the park immediately across from the project site; thus, there is no legal path of travel for equestrians to access Guajome Regional Park through this site and the proposed development would not impede equestrians from using existing access points. The project site is designated for residential development. Residential uses are generally considered compatible with equestrian uses, and perimeter fencing and

> retaining walls will ensure separation from existing equestrian uses in the surrounding area.
>
> (Response to Comment I2-3, see also, Response to Comment I25-7.)

Response to Comment O5-5 further explains that social considerations, such as the "community values" cited in this comment, are not environmental impacts subject to CEQA review (*Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 585; *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357). Nevertheless, the project's consistency with the General Plan demonstrates that broader community objectives and values have been appropriately considered.

Finally, case law establishes that zoning standards that are waived are not "applicable" for purposes of evaluating consistency with General Plan policies or zoning regulations (*Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349; *Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 782–783). As a result, the EIR was not required to identify the project's deviation from equestrian overlay development standards as an inconsistency with the General Plan or zoning code.

b. <u>Project Consistency with Scenic Park Overlay District Standards and Guajome Regional Park Sphere of Influence (SOI) Policies</u>

Regarding compatibility with the neighboring park and consistency with the Scenic Park Overlay District, Response to Comment O5-5 evaluates project consistency with these zoning standards. A table demonstrating how project consistency with the Development Regulations set forth in Section 2204 of the Zoning Ordinance for the Scenic Park Overlay District is addressed in the Draft EIR is also provided. (Final EIR pp. 2-379 to 2-383.)

Response to Comment O2-35 directly addresses the comment regarding Policy H of the Guajome Regional Park SOI. (Final EIR pp. 2-300)

> To clarify, Policy H provides structures be oriented to preserve views from Guajome Regional Park, the development, and surrounding properties. Section 4.1.4 of the Aesthetics section of the Draft EIR (Draft EIR, p. 4.1-6) explains:
>
>> Direct views of the project site are limited to adjacent residences to the east, north, and west and to users of Guajome Regional Park trails adjacent to the project site's southern boundary across Guajome Lake Road. In proposed conditions, the project would be visible from adjacent parcels and may be visible from some distant public viewpoints due to the proposed height of the buildings. However, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses.

> As described in Section 4.1, Aesthetics, of the Draft EIR on page 4.1-8, the Draft EIR also explains that the proposed development would be set back from Guajome Lake Road and adjacent residences to provide privacy and visual relief, with landscaping designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. The project would be consistent with this policy for the reasons detailed in the Draft EIR.

See also, Responses to Comments O2-33 through O2-38, addressing consistency with other Policies of the Guajome Regional Park SOI. (Final EIR, pp. 2-299 through O2-301)

c. Park Consultation Occurred—However, Consultation with the Inactive Committee was Impossible and, thus, Not Required

With respect to the comment concerning consultation with the Guajome Regional Park Area Planning and Coordinating Committee, Response to Comment I26-5 explains that the committee is no longer active—such solicitation is, therefore, impossible. However, the City solicited comments from the San Diego County Department of Parks and Recreation. The County provided comments, Comment Letter A2, which comments were responded to by the City in the Final EIR.

d. Waiver Setting a Precedent

Ms. Jacobs asserts that the EIR fails to analyze whether approval of overlay standard waivers would set a precedent. However, waivers of development standards are required under State Density Bonus Law for qualifying housing projects where standards would physically preclude development, and the authority to grant such waivers derives from State law rather than project-specific discretion.

Moreover, the City's 2021–2029 Housing Element Update and Zoning Ordinance implement Density Bonus Law provisions and expressly contemplate approval of waivers or modifications from development standards for qualifying housing projects.

II. Preserve Calavera Email (January 27, 2026)

Preserve Calavera commented that "the EIR mentions the Guajome Sphere of Influence, but fails to discuss compliance with the Goal or the specific policies A-L of Section 1.37" and fails to address visual impacts as included in this section.

Consistency with these policies was addressed in the Final EIR, including in Section 4.1, Aesthetics and the Responses to Comments.

a. Consistency with Guajome Regional Park Sphere of Influence (SOI) Policies

As discussed in Response to Comment O2-33:

Draft EIR Section 4.1, Aesthetics, provides the objectives and policies for the Guajome Regional Park SOI. In addition, project compliance with SOI policies is demonstrated in the threshold discussions under Draft EIR Section 4.1.3, Thresholds of Significance (see threshold a and c in Draft EIR Section 4.1). Specifically, these threshold impact discussions describe project features, including architectural style, massing, building exteriors and materials, landscaping, views of the project site from Guajome Regional Park, and how the project would be designed to blend with the surrounding environment, consistent with and subject to the objectives and policies under the Guajome Regional Park SOI as outlined under Draft EIR Section 4.1.2.

More specifically, the applicable policies and related analysis are provided in the Draft EIR at pages 4.1-3 through 4.1-8. Responses to Comments O2-34 through O2-37 address comments regarding Policies F, H, I, and J and provide additional support for the Project's consistency with those policies. See also the response to Ms. Jacobs' comments, above, regarding Policy H. Policy B, which calls for coordination with the Guajome Regional Park Area Planning and Coordinating Committee, is addressed in Response to Comment I26-5 and the response to Ms. Jacobs' comments, above, which explain that the committee is no longer active and that coordination is therefore not feasible.

More generally, the Housing Accountability Act limits local governments' ability to deny or reduce the density of housing development projects that comply with applicable objective development standards. Many of the cited policies are discretionary or subjective in nature (for example, requirements that exterior colors be "compatible"), and therefore fall outside the category of objective standards. (Gov. Code, § 65589.5 (j)(1), (h)(8).) The limitations adopted in the Housing Accountability Act are intended to narrow the types of subjective or aspirational policies that may be invoked to defeat or constrain the development of much-needed housing.

III. Chatten-Brown Law Group (August 11, 2025)

A comment states the EIR fails to disclose the project's inconsistency with SANDAG's RTP/SCS because, allegedly, the site forecast the site as "Spaced Rural Residential at a "much lower density" than proposed by the project. (See pp. 8-9 of this letter)

In response, the Final EIR adequately addresses consistency with the San Diego Association of Governments (SANDAG) 2021 Regional Plan, which incorporates the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), in Sections 4.2, Air Quality; 4.7, Greenhouse Gas Emissions; 4.10, Land Use and Planning; and 4.15, Traffic and Circulation.

SANDAG's growth projections are based on population, vehicle trends, and land use plans adopted by local jurisdictions, including cities' General Plans. SANDAG relies on local General Plan land use designations—not project-level densities—to forecast and accommodate growth. The project site is designated Single Family Detached Residential in the City of Oceanside General Plan and zoned RS-SP-EQ, which allows single-family residential development. The

proposed Project is consistent with the underlying land use designation and zoning, with requested waivers of development standards pursuant to the State Density Bonus Law. Accordingly, the Project does not conflict with the land use assumptions underlying SANDAG's regional growth forecasts.

In addition, SANDAG's most recent Regional Housing Needs Assessment (RHNA) identifies a need for 5,443 housing units in Oceanside between 2021 and 2029, including substantial needs across all income categories. The City has a projected deficit of 1,268 very-low units, 718 low-income units, 883 moderate units, and 2,574 above-moderate income units (SANDAG 2020). The proposed project is expected to bring 83 units to market in 2025, including 4 low-income units and 75 above moderate-income units, which would be within SANDAG's growth projection for housing during the 6th Cycle planning horizon (i.e., April 2021 – April 2029). Therefore, the proposed project would not conflict with SANDAG's regional growth forecast for the City (Appendix B). As described in Section 4.2, Air Quality, the Project would not conflict with SANDAG's growth projections.

Moreover, the RTP/SCS does not function as a land use designation or impose project-specific density limits. Rather, it establishes regional policy frameworks to guide growth, transportation investment, and greenhouse gas reduction while relying on local land use plans for implementation. The EIR evaluates the Project's consistency with RTP/SCS transportation and sustainability policies in Sections 4.10 and 4.15, explaining that the Project would provide residential development on an infill site within the City, supported by existing infrastructure and located near transit, employment, services, and recreational uses. The Project includes pedestrian and circulation improvements and would not result in environmental impacts due to inconsistency with the RTP/SCS.

Accordingly, the EIR adequately addresses RTP/SCS consistency, and the commenter has not identified a deficiency in the environmental analysis.

Responses to Additional Comments on Recreation

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that the EIR fails to analyze indirect impacts to Guajome Regional Park and Guajome Lake from adjacent residential use, including stormwater runoff to the lake, user conflicts, and degradation of the park experience.

In response, each of these recreation comments was fully addressed in the Final EIR, including Section 4.14, Recreation, 4.13, Public Servies, 4.9, Hydrology and Water Quality, , Section 4.1, Aesthetics, and the Responses to Comments.

a. Recreational Impacts from Residential Use were Analyzed

As discussed in Draft EIR Section 4.14, Recreation, while the project would increase the utilization of existing parks and recreational facilities within the City; it is determined that the combination of proposed open space amenities on site, existing park and recreational facilities in the area, and proposed future recreational facilities within the City would adequately serve future residents of the project site. In addition, the project is located entirely within the City of Oceanside and would not result in an encroachment onto Guajome Regional Park property.

Response to Comment A2-16 explains:

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

b. Stormwater Impacts to Guajome Regional Park and Guajome Lake were Analyzed.

Concerning runoff, refer to Section 4.9, Hydrology and Water Quality, of the EIR, response to Comment I6-2 and Response to Comment A2-19. The Draft EIR Section 4.9, Hydrology and Water Quality, describes that the project will comply with the San Diego Municipal Storm Water Permit Order No. R9-2013-0001 and implement pollution control and BMPs during project construction and operation. Compliance with applicable water quality and stormwater regulations and the City's BMP Design Manual would prevent pollutants from entering the regions storm drain system, in compliance with all applicable requirements of the San Diego Regional Water Quality Control Board and City of Oceanside.

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

The project's SWQMP (Appendix I) was prepared based on requirements set forth in Provision E.3 of the RWQCB's NPDES MS4 Permit that covers the San Diego Region (Order No. R9-2013-0001). The stormwater quality design was also prepared in accordance with the City's BMP Design Manual. The Draft EIR describes the project would implement permanent source control measures, which would include prevention of illicit discharges, storm drain signage, on-site storm drain inlets, future indoor and structural pest control, and landscape/outdoor pesticide use. Two biofiltration basins are proposed on the project site to provide stormwater treatment for the pollutants discharged from the development (Appendix H, Preliminary Hydrology Study). The project would be required to provide for implementation of ongoing maintenance of these features. Further, the project is required to maintain structural stormwater BMPs in accordance with the SWQMP Operations and Maintenance Plan and to provide documentation of annual maintenance verification to the City as required by the Regional MS4 Permit.

Additionally, the proposed landscaping throughout the project site would further stabilize soil, reducing erosion compared to the existing condition and as required by mitigation measure MM-BIO-3, would not "use plants that require intensive irrigation, fertilizers, or pesticides adjacent to the Preserve" and water runoff from landscaped areas would be directed away from the open space areas and contained and/or treated within the development footprint. Landscaping within the Subarea Plan buffers would also consist of native species.

c. The Project would not Degrade the Park Experience, which in any Case is not an Environmental Effect Subject to CEQA review

Degradation of the park experience would not generally be considered a physical impact on the environment but rather a social effect not subject to CEQA review. (*Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 585; *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357). Response to Comment O5-5 addresses consistency with the Scenic Park Overlay District regulations, including that development "not materially degrade the visual resources of the site or adjacent public parks": As described, the Project would be consistent with this policy:

> As described in Chapter 3, Project Description, and Section 4.1, Aesthetics, of the Draft EIR at pages 4.1-7 to 4.1-8, the project would be built in a variety of contemporary architectural designs in one of three styles, referred to as "ranch," "farmhouse," and "progressive prairie." The architectural styles would be reinforced through massing and materials. A variety of roof forms would be included to shape the massing, ranging from all gable, a combination of hip and gable, and all hip. Style-specific window grids and window and door trim, along with front door and garage door styles, would help reinforce the architectural character. The homes would be predominantly stucco, with either shingle, board and batten, or lap siding accents. Primary proposed building material finishes would include white, grey, or beige stucco exterior walls. Enhanced elevations would be included based on the elevation exposure to public edges. The proposed home plans each have 3 elevation styles, with each style having 3 distinct color schemes, resulting in 27 possible combinations. All outdoor lighting would meet Chapter 39 of the City Municipal Code (light pollution regulations) and would be shielded appropriately. Street lighting featured throughout the site would be appropriately shielded to reduce lighting impacts to the surrounding open space areas and improve darksky regulation compliance. Additionally, the proposed development would be set back from Guajome Lake Road and adjacent residences to provide privacy and visual relief. Furthermore, proposed landscaping is designed to provide a distinct visual character, enhance the project, and enable the project to blend with the surrounding environment. Retaining walls would be located along the project frontage, entries, and best management practice areas to support the required grading and storm drainage for the project site. A variety of vegetation would be featured along the boundaries of the project site. Drought-tolerant plants would be utilized as aesthetic and functional requirements for the site. Landscaping would also be featured adjacent to public rights-of-way. Building heights would be limited to 25 feet. Further, due to the project's location surrounded by residential developments, the lack of scenic viewpoints or scenic vistas in the immediate area, and the developed nature of the vicinity, development of the project site is expected to blend with the surrounding uses. Final site plans and landscape plans would be subject

to review and approval by the City, further ensuring compatibility. Thus, the project would be consistent with this regulation.

It is also worth reiterating that the project would permanently preserve approximately 41 percent of the site –6.92 acres – as open space.

II. John Osborne email (January 21, 2026)

The commenter asserts that the EIR does not adequately address the disruption project construction would cause to wildlife and to "those who use the park for recreation and spiritual renewal."

The EIR adequately addresses potential construction-related disruption associated with the Project. Potential construction-related impacts to wildlife are addressed in Draft EIR Section 4.3, Biological Resources, and the Biological Technical Report (Appendix C), which evaluate construction disturbance and identify measures to avoid and minimize impacts to wildlife during construction. Draft EIR Section 4.11, Noise, evaluates construction noise using conservative thresholds and City construction-hour regulations and concludes that construction noise impacts would be less than significant. Draft EIR Section 4.14, Recreation, concludes that the Project would not result in significant impacts to recreational facilities, including Guajome Regional Park, and the Final EIR further discloses that construction of project-related improvements along Guajome Lake Road could result in temporary access constraints, which would be managed through implementation of a traffic management plan to maintain access during construction (Final EIR, p. 3-62) To the extent the comment raises concerns regarding disruption to "spiritual" uses of the park, CEQA is limited to the analysis of physical impacts on the environment and does not require analysis of subjective social, psychological, or spiritual effects.

Responses to Additional Comments on Transportation

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs commented, "The EIR fails to analyze increased accident risk associated with blind curves, narrow road widths, and lack of pavement or shoulders, despite adding residential traffic to roads with known geometric and visibility constraints." Ms. Jacobs also commented that the Project screened out regarding VMT impacts, and though SANDAG has identified the site will produce VMT "at levels over 100% to 125% of the Regional Mean, the EIR provides no analysis or mitigation for VMT impacts."

These comments were addressed in the Final EIR, including Section 4.15, Traffic and Circulation and the Responses to Comments.

a. The Project would not Substantially Increase Hazards

Related to this comment, the Traffic and Circulation section of the EIR considers whether the project would "Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)" or "Result in inadequate emergency access." (Section 4.15.3 of the Draft EIR.)

The concerns raised primarily describe existing roadway conditions on Guajome Lake Road and do not demonstrate that the Project would cause or substantially contribute to a new or worsened traffic safety impact beyond those analyzed in the EIR.

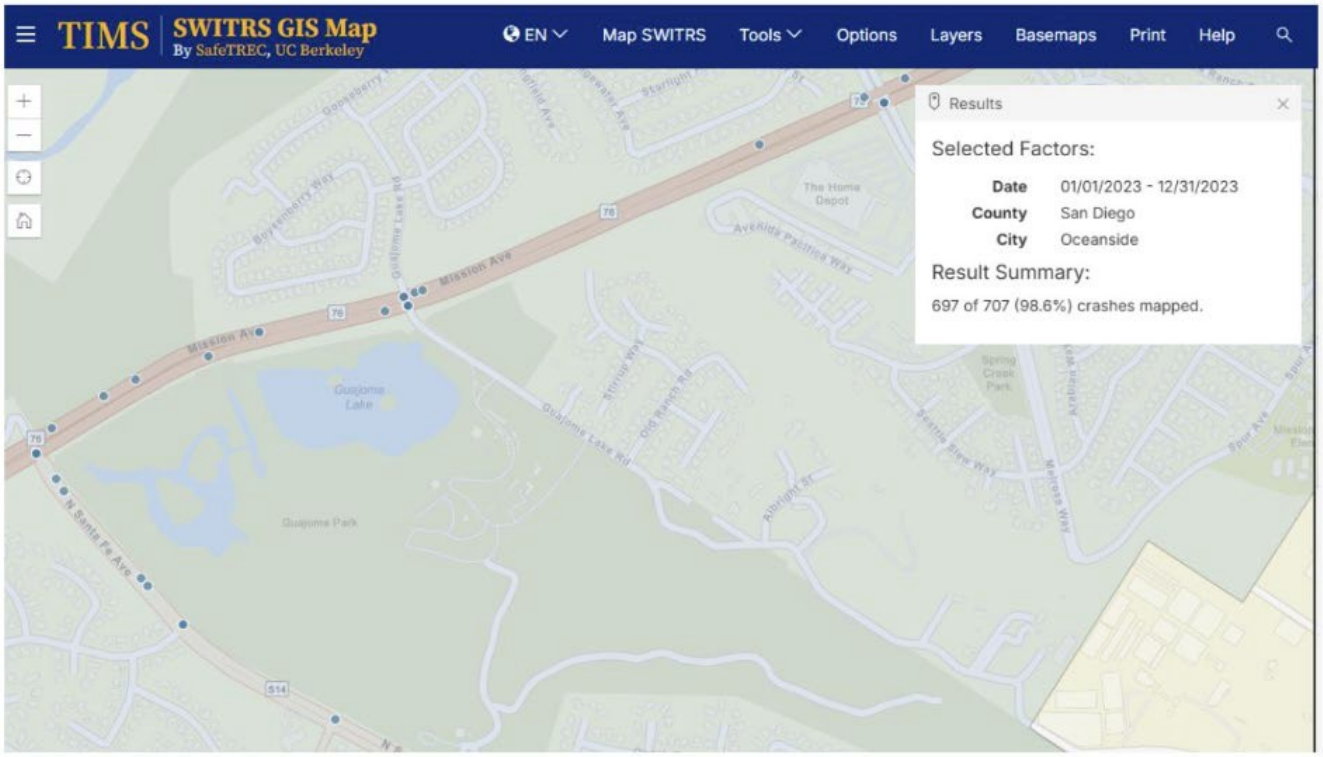
As discussed in Section 4.15.4 (c) of the Draft EIR, Traffic and Circulation, the project does not propose any sharp curves or dangerous intersections, and circulation and vehicle use on site would be typical of a single-family residential development. Additionally, emergency access points would be provided along the southern boundaries of the project site, and final project plans would undergo review by the Oceanside Fire Department to ensure compliance with fire code standards. (See also, Response to Comments I1-2 and I1-3 [Final EIR, pp. 2-69 through 2-70.])

While the project would add daily vehicle trips to Guajome Lakes Road, the potential for an increase in traffic has been evaluated in the project's LTA and found to be acceptable per the City's standards. CEQA doesn't require speculation, and adding people to a roadway that meets standards and is being improved is not a significant hazard. Moreover, the project will pave the segment of Guajome Lake Road along the project site frontage northwest to Albright Street, approximately 1,200 linear feet (Draft EIR, p. 3-5), which will improve this segment to the standards of a Collector road. According to City roadway standards paving this segment will increase the capacity of the roadway such that the LOS on this segment would be enhanced to LOS A, showing the roadway will operate acceptably and in compliance with City standards. (*Ibid.*)

Road improvements would include 40-foot-wide curb to curb improvements, including a 5-foot parkway and a 5-foot sidewalk. The internal private road would be 28 to 32 feet wide with 5-foot-wide sidewalks (Draft EIR, p. 3-2). In addition, circulation and emergency access drives have been designed in consultation with Oceanside Fire Department staff to provide 28-foot minimum widths with designated truck turnarounds and key staging areas throughout the project site (Draft EIR, p. 3-5). This would ensure adequate emergency access and safe driving conditions. (Response to Comments I2-5 [Final EIR p. 2-76].)

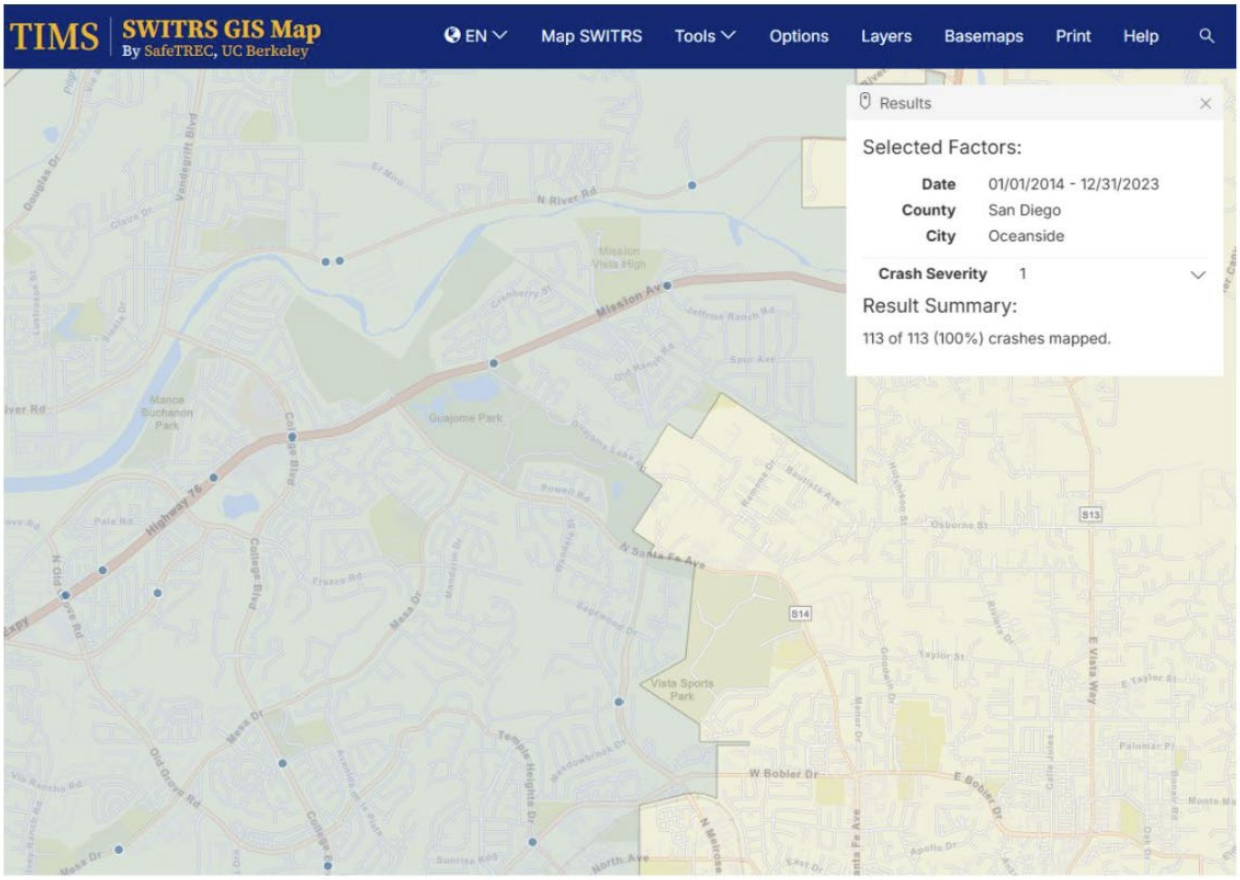
While an 800-foot segment of Guajome Lake Road would remain unpaved, the speed limit along the entirely of Guajome Lake Road would remain 25 miles per hour. With project implementation, speed limits within the project site would be regulated for the safety of both vehicular and pedestrian traffic.

Generalized public comments regarding the safety of the unpaved portion of this roadway are not substantiated by—and are indeed contradicted by—the traffic data. While unpaved roads comprise a substantial portion of the roadway network nationally (~35%), they account for a small fraction of roadway fatalities (2%), indicating that unpaved roads are not inherently more dangerous simply because they are unpaved. Indeed, review of the most recent available accident data (January 1, 2023 through December 31, 2023) from the Transportation Injury Mapping System (TIMS) shows **no reported collisions** on Guajome Lake Road in its current, unpaved condition.[3] Collisions are shown by dots on the screenshot below.



[3] https://tims.berkeley.edu/

The data also shows **no fatalities** on Guajome Lake Road in the last 10 years.



In sum, as demonstrated in the Traffic and Circulation analysis, project-related traffic would remain within the City's adopted standards, the project would improve emergency access compared to existing conditions, and the project would not introduce hazardous roadway design features or incompatible vehicle uses. Accordingly, the addition of project traffic would not result in a substantial increase in accident risk or roadway hazards.[4]

b. <u>VMT Impacts were Appropriately Evaluated</u>

Responding to the comment that the project is currently in a high vehicle miles traveled (VMT) area that will be exacerbated by the project, this comment was addressed at Response to Comment O2-7 of the Final EIR. As explained there, the City's Traffic Impact Analysis Guidelines for VMT and Level of Service (LOS) Assessment identifies several types of projects that are appropriately screened out from a detailed VMT analysis as either locally serving or based on substantial evidence provided by the Governor's Office of Planning and Research Technical Advisory Committee supporting Senate Bill [SB] 743 implementation, which identifies potential screening out of VMT impacts based on small project size/trip generation,

[4] This response also addresses the same issue raised, among others, in correspondence from Chatten-Brown dated August 11, 2025, at pp. 5-6; and dated January 27, 2026, at pp. 3-7.

maps, transit availability, and/or provision of affordable housing. Projects consistent with the General Plan represent the vision and goals the City has for the community and therefore and do not require additional VMT analysis if they generate 1,000 average daily trips (ADT) or less.

The City's VMT screening threshold stems from the professional expertise and judgment of the ITE San Diego section to reflect what is appropriate for the San Diego region to use for VMT. These TIA Guidelines were in effect at the time the project submitted a preliminary application and are therefore vested pursuant to the Housing Crisis Act of 2019 (SB 330, Gov. Code, §§ 65941.1, 65589.5 (o).). Accordingly, the applicable VMT methodology and screening criteria properly apply to the project.

The project is consistent with the General Plan and projected to generate 830 ADT, less than the 1,000 ADT threshold for further VMT analysis. (See Section 4.10.4 [General Plan Consistency Analysis], Gov. Code, § 65589.5 (j)(3) [receipt of density bonus, concession, or waiver is not basis for General Plan inconsistency]) Thus further VMT analysis is not required for this small project, and impacts are determined to be less than significant (see Draft EIR Section 4.15, Traffic and Transportation).[5]

In addition to satisfying the City's adopted VMT screening threshold and resulting in a less-than-significant VMT impact, the Project would help reduce overall regional vehicle miles traveled by providing needed housing on an infill site within the City of Oceanside that is surrounded by existing residential development and served by existing public infrastructure and services. According to U.S. Census Bureau data reported by *Voice of San Diego*, more than 47,000 households commute daily from Riverside County to San Diego for work, representing an estimated over one billion vehicle miles traveled annually by commuters who live outside the County due to housing supply and affordability constraints. Similarly, thousands of workers commute daily from Tijuana across the border to reach employment centers in San Diego. These commuting patterns illustrate how housing shortages displace households to distant regions, increasing long-distance travel and associated vehicle miles traveled. As the Legislature has recognized, California's housing shortage has increased vehicle miles traveled and greenhouse gas emissions by redirecting households to more distant locations (Gov. Code, § 65589.5(a)(2)(I)). The Project advances state and local objectives by adding housing in Oceanside, in proximity to jobs, services, and existing development.

The Project would also include pedestrian improvements, including sidewalks, and is located adjacent to and near existing trail networks, which support walking and recreational travel as alternatives to vehicle trips.

[5] This response also addresses the same issue raised, among others, in correspondence from Chatten-Brown dated August 11, 2025, at pp. 4-6

Responses to Additional Comments on Cumulative Impacts

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that the Draft EIR fails to adequately analyze cumulative safety impacts from the project in combination with other nearby development that would add traffic to Guajome Lake Road, and that the cumulative analysis improperly excludes projects in Vista and unincorporated County areas despite shared access routes and evacuation paths across jurisdictional boundaries. The comment references a project at Osborne & N. Santa Fe, which appears to refer to the 46-unit "Camino Largo" project in the City of Vista.

This comment was addressed in the Final EIR, including Section 4.15, Traffic and Circulation, Chapter 6, Cumulative Effects, and the Responses to Comments.

a. Traffic is not a CEQA Impact; Cumulative Effects regarding Traffic Hazards Were Considered

As discussed in Response to Comment I1-2, I2-5, and O2-116, among others the CEQA impact significance determination for the proposed project is not based on LOS, which residents would commonly view as "traffic" or "delay" impact. Under CEQA, LOS or other measures of vehicle capacity or traffic congestion (i.e., traffic delay) are no longer considered in evaluating whether a significant impact on the environment would occur; therefore, the LOS analysis referred to in the EIR and its Local Transportation Analysis (LTA) in Appendix K has been provided for informational purposes only.

To account for potential increase in traffic along Guajome Lake Road, the LTA includes an analysis of cumulative projects in the vicinity anticipated to add traffic to Guajome Lake Rd. The information regarding approved and pending projects is obtained from adjacent jurisdictions at the time of preparation of the traffic assessment. There were no potential projects identified in the near term that would add traffic to the segment of Guajome Lake Road adjacent to the project site due to the circuitous and out of the way travel required to use Guajome Lake Rd. Therefore, a 1% background growth factor was added to existing volumes to account for the potential cumulative traffic increase along Guajome Lake Rd. The additional cumulative traffic volumes were incorporated into the analysis, and would account for any negligible traffic related to the referenced project (Camino Largo) that used this circuitous travel route.

Further, note that San Diego County, as well as the City of Vista, were solicited for comment as they were included on the City's mailing list for noticing for the proposed project. The County of San Diego provided comments at Comment Letter A2, which received responses. The City of Vista did not provide any comments on the Draft EIR.

The LTA in Appendix K addresses whether road widening or repairs are needed to address a significantly worsened traffic condition resulting from the project and cumulative impacts, and Appendix K evaluates the increase in traffic within the study area, the Guajome Lake Road/N.

and S. project driveway intersections, and Guajome Lake Road along the project frontage street segment (Draft EIR Appendix K, p. 7). This evaluation calculated LOS during the AM and PM peak hours with and without the addition of project trips.

Based on the City's traffic thresholds and methodology, offsite roadway improvements would not be required because the project would not result in exceedance of City thresholds. As discussed in Draft EIR Section 4.15, Traffic and Circulation, the LTA conducted for the project evaluated four scenarios: Existing, Existing Plus Project, Near Term, and Near Term Plus Project, and determined that the project would not result in traffic impacts as defined in the Oceanside Traffic Guidelines; thus no off-site roadway improvements are recommended or required.

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

Responses to Additional Comments on Growth Inducement, Project Description, and Other CEQA Issues

I. Jennifer Jacobs Letter (January 22, 2026)

Ms. Jacobs asserts that the EIR inadequately analyzes growth-inducing impacts by minimizing the effects of sewer and infrastructure extensions that could facilitate additional development near Guajome Park, and by dismissing secondary growth-related environmental effects without meaningful analysis. She further contends that the EIR mischaracterizes the project as infill despite its edge location adjacent to parkland and open-space uses, and that the Final EIR fails to cure deficiencies identified in the Draft EIR by adding substantive analysis or revising its conclusions.

These comments were addressed in the Final EIR, including Chapter 3, Project Description, Section 4.12, Population and Housing, Section 4.13, Public Services, Section 4.17, Utilities and Service Systems, Section 7.1, Growth Inducement and the Responses to Comments.

a. The Project would Not Induce Substantial Growth

Section 7.1 of the EIR explains that the project would not lead to indirect growth because the project would not provide for additional infrastructure improvements that would allow for additional unplanned growth in the area. The project does not remove obstacles to growth by extending infrastructure to new areas, nor would it result in significant adverse environmental impacts beyond those analyzed in this EIR due to the expansion of infrastructure, such as water supply facilities, wastewater treatment plants, roads, or freeways. The project would include utility improvements and roadway improvements; however, these upgrades would only be to the proposed project connection points and would only be upgraded to serve the project site.

Response to Comment O6-13 further addresses Ms. Jacobs' growth inducing comment. It explains the project proposes a private sewer system that would connect to the existing City sewer infrastructure located in Old Ranch Road, northwest of the project and would connect to San Diego Gas & Electric electricity and natural gas lines also available in nearby roads. Significant expansion is not proposed.

As described in Draft EIR Chapter 3, project implementation would include improving Guajome Lake Road along the project frontage and extending northwest to connect to Albright Street, approximately 1,200 linear feet, to current City roadway and fire code standards. The project would not construct any new roads off-site or extend any existing roads that could be considered growth inducing.

While the project would add 83 homes, the increase in population growth at the project site is anticipated by and accounted for in the City's General Plan Land Use Element and Housing Element based on the site's existing land use designation of SFD-R (Single-Family

Detached Residential) and zoning designation of RS-SP-EQ (Single Family Residential – Scenic Park Overlay – Equestrian Overlay).

Finally, the project site is located in an infill area, already substantially surrounded by single-family residential development. In sum, the project would not be considered growth inducing.

For each of these reasons, and contrary to the comment, indirect growth related impacts (e.g., additional development pressure, service demand, VMT, GHG emission, habitat loss) would not result.

b. The Project Site is Appropriately Describes as Infill

Response to Comment I24-3 explains the project would be considered to meet the definition of "infill development" because it proposes 83 residential units in an urbanized area within unused and underutilized land containing a vacant residential structure and driveway, abutting other existing residential developments in the surrounding area. Refer to page 4.1-7 of the Draft EIR. Section 4.15 of the Draft EIR evaluates the project's impact related to traffic and circulation, which evaluating vehicle miles traveled, as well as bicycle, pedestrian, and transit facilities.

Response I27-30 further clarifies:

> The Governor's Office of Land Use and Climate Innovation describes the term "infill development" as referring to building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas. Infill development is critical to accommodating growth and redesigning our cities to be environmentally and socially-sustainable. The project is considered to meet this description, as well as the common definition of "infill development," because the properties adjacent to the western, northern, and eastern property boundaries are developed with residential uses and Guajome Lake Road is adjacent to the site's southern boundary and because it proposes to place housing on underutilized land that has previously been developed in an urbanized area. The Draft EIR does not rely on any of the streamlining provisions or exemptions that CEQA affords to infill sites and does not identify the project as transit-oriented. It provides a robust analysis of the project's potential environmental effects and uses the term infill only to characterize that adjacent properties are developed rather than in the context of the formal Public Resources Code definition quoted in this comment.

See also, Figure 3-1, Project Location, showing the site within an urbanized are adjacent to developed residential properties.[6]

c. The EIR Responded to and Addressed Public Comments

As shown in these responses and contrary to the comment, the City fully responded to and addressed comments in the Final EIR. No alleged "deficiencies" were left unresolved.

II. Chatten-Brown Law Group (August 11, 2025)

A comment states the EIR failed to include a "General Plan compliant" alternative, and asserts a prior application proposed 33 units onsite. (See pp.9-10.) Refer to Response to Comment O5-2, which explains that the EIR adequately evaluates a reasonable range of alternatives consistent with CEQA. CEQA does not require an EIR to include an alternative that merely reflects a commenter's preferred project configuration or a prior, withdrawn application. As explained in Response to Comment O5-2, alternatives were selected based on their ability to meet most of the Project's objectives while avoiding or reducing significant environmental impacts, and the alternatives analysis is not rendered inadequate because it does not include an alternative limited to the number of units proposed in an earlier, unrelated application.

In addition, an alternative limited to a substantially reduced number of units would reduce housing capacity and could be considered legally infeasible in light of the State Density Bonus Law, the State's declared housing crisis, and Public Resources Code section 21159.26, which limits reliance on reduced-housing alternatives where feasible options exist that maintain comparable housing capacity. Accordingly, the absence of an alternative that eliminates density bonus benefits and/or limits to the number of units to 33 units proposed in a prior application does not render the alternatives analysis inadequate.

[6] This response also addresses the same issue raised, among others, in correspondence from Chatten-Brown Law Group dated August 11, 2025, at pp. 1-4 and dated January 27, 2026 at pp. 10-11.

Response to Comments Regarding Planning Commission Action

I. Preserve Calavera Email (January 27, 2026)

The commenter asserts that Planning Commission Resolution No. 2025-P26 (Attachment) identifies deficiencies in the EIR and contends that the Resolution provides additional evidence of the EIR's inadequacy, reiterating arguments previously raised.

In response, the referenced ***draft*** resolution was **not adopted** by the Planning Commission and therefore does not reflect an official determination regarding the adequacy of the EIR. To the contrary, the Planning Commission voted to certify the EIR and adopted Resolution No. 2025-P23, certifying the Final EIR and adopting findings of fact and a mitigation monitoring and report for the project. This resolution found the Final EIR was completed in compliance with CEQA. It also voted to approve the project Tentative Map, Development Plan, and Density Bonus applications by adopting Resolution No. 2025-P20.

Each environmental issue identified in the draft resolution No. 25-P26 has been fully addressed in the Final EIR and the Responses to Comments, including these responses to late comments and testimony received at public hearings. Accordingly, the inclusion of the draft resolution does not demonstrate a deficiency in the EIR or undermine its conclusions.

Response to Comments Regarding Density Bonus Law, Housing Accountability Act, and City's Inclusionary Ordinance

Several late comments were received opposing the development density and asserting that the Project improperly relies on the State Density Bonus Law to obtain waivers of development standards, including waivers of Equestrian Overlay District development standards.

These comments do not raise new or additional legal or environmental issues concerning the adequacy of the EIR. The commenters are referred to Final EIR Responses to Comments I2-8 and O5-5, as well as Chapter 3, Project Description, and Draft EIR Section 4.10, Land Use and Planning, which address these contentions in detail and demonstrate that the Project fully complies with the State Density Bonus Law and other applicable state housing laws.

As described in Draft EIR Section 4.10, the Project includes a development plan, tentative map, and a request for a density bonus pursuant to the State Density Bonus Law. Because the Project would provide four deed-restricted very-low-income housing units, the Density Bonus Law requires the City to grant an incentive or concession and permits the granting of waivers of development standards that would physically preclude construction of the project at the density allowed by state law. As the Court in *Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775 explained, "so long as a proposed housing development project meets the criteria of the Density Bonus Law by including the necessary affordable units, a city may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes 'amenities' beyond the bare minimum of building components." To accommodate the permitted density and proposed amenities, the Project requests waivers of certain development standards, including standards within the Equestrian Overlay District.

A summary of applicable development standards and requested waivers is provided in Table 3.3-1 of Draft EIR Chapter 3, Project Description (as updated in Chapter 3, Errata, of the Final EIR), which demonstrates either compliance with the City's zoning regulations or identifies where waivers are requested pursuant to the Density Bonus Law.

With approval of the requested density bonus and related waivers, the Project would remain consistent with the City's General Plan and zoning designations for the site. The Project's consistency with applicable General Plan goals, policies, and objectives is evaluated in Table 4.10-1, City of Oceanside General Plan Consistency Evaluation, and Draft EIR Section 4.10, Land Use and Planning, which conclude that implementation of the Project would not result in a land use conflict. Accordingly, no additional environmental analysis is required.

I. Chatten-Brown Law Group (August 11, 2025 and January 27, 2026 letters)

a. Waivers

A comment suggests generalized traffic safety concerns may preclude approval of Density Bonus Law waivers, including the requested waivers of Equestrian Overlay District development standards.

To the contrary, waivers may be denied only where substantial evidence shows they would result in a "specific, adverse impact, as defined in paragraph (2) of subdivision (d) of Section 65589.5, upon health or safety…for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact." (Gov. Code, § 65915(e)(1).) The Housing Accountability Act, in turn, defines a "specific, adverse impact upon the public health and safety" as "a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete". (Gov. Code, § 65589.5(d)(2).)

As demonstrated by the traffic analysis in the EIR, no such impact has been identified. The commenter does not identify any objective, written public health or safety standard that would be violated by approval of the requested waivers, nor do they demonstrate that any alleged impact would be significant, quantifiable, direct, and unavoidable. Assertions regarding roadway conditions and equestrian safety are not supported by traffic data, accident history, or adopted safety standards, and no evidence is provided to show that any identified condition would be unmitigable. Generalized concerns and anecdotal statements do not satisfy the statutory standard required to deny Density Bonus Law waivers.

b. Base Density

The commenter asserts the project uses an "inflated baseline" for the density bonus calculation because allegedly "other factors" beyond a dwelling units per acre requirements should apply of that 3.6 dwelling units per acre should be used in lieu of 5.9 dwelling units per acre. Not so.

Under State Density Bonus Law:

> "Maximum allowable residential density" or "base density" means the greatest number of units allowed under the zoning ordinance, specific plan, or land use element of the general plan, or, if a range of density is permitted, means the greatest number of units allowed by the specific zoning range, specific plan, or land use element of the general plan applicable to the project. Density shall be determined using dwelling units per acre.

(Gov. Code, § 65915 (o)(6).)

The maximum dwelling unit per acre allowance in any local regulatory framework is used. (See March 9, 2023, HCD Letter to ElDoradoCounty-TA-030923.pdf; *West Adams Heritage Assn. v.*

City of Los Angeles (2024) 106 Cal.App.5th 395, 436.) There is no hierarchy among competing or conflicting planning documents. "[A]ny hierarchy between planning documents is *flattened*" by the statutory language. (*See* July 31, 2024, HCD letter to City of Los Angeles Density Bonus Law Implementation – Letter of Technical Assistance, emphasis added.) As the court explained in *West Adams Heritage*, "[t]he disjunctive 'or' indicates that when a locality has multiple land use provisions governing density that conflict with one another, the locality should look to the provision that allows the greatest number of units to be constructed." (*West Adams Heritage, supra,* 106 Cal.App.5th at p. 436.)

DBL also mandates that the law "shall be interpreted liberally in favor of producing the maximum number of total housing units." (Gov. Code, § 65915 (r).)

As noted by the comment, the maximum density allowed for the site under the SFR-D designation is 5.9 dwelling units per acre. Table LU-1 is excerpted below, showing the maximum potential residential density in for properties designated SFR-D as 5.9.

Table LU-1
Residential Land Use Designations

Designation Title	Potential Range of Dwelling Units per Gross Acre*	
	Base Density**	Maximum Potential Density**
Estate A	0.5	0.9
Estate B	1.0	3.5
Single Family Detached	3.6	5.9
Medium Density A	6.0	9.9
Medium Density B	10.0	15.0
Medium Density C	15.1	20.9
High Density	21.0	28.9
Urban High Density	29.0	43.0

* Explanation of developable and non-developable lands:
Density ranges of residential designation do not imply minimum and maximum residential densities that can be uniformly applied to any particular site.

Physical characteristics of a site along with a site's relationship to external factors can modify a site's density. A careful examination of City policy should be made to clarify developable lands and undevelopable lands within a particular site.

** Explanation of residential density ranges:
Densities between the base density and maximum potential density within each residential density range represent density potentials that could be obtained on developable portions of a site.

Even if the densities were not viewed as a "range," the statute requires applying the *greatest* number—here, 5.9 du/ac.

Similarly, the Oceanside Zoning Ordinance, Section 1010 provides the following for the RS Single-Family Residential District:

> To provide opportunities for single-family residential land use in neighborhoods, subject to appropriate standards. Duplexes, triplexes and fourplexes existing as of the effective date of this ordinance are allowed to remain, but all new residential construction shall be single-family dwellings or approved accessory structures (except as otherwise noted in

Section 1030). **In the RS District, the base density is 3.6 dwelling units per gross acre and the maximum potential density is 5.9 dwelling units per gross acre.** (emphasis added.)

Under either the City's General Plan land use designation or zoning, 5.9 du/ac is appropriate.

In addition, contrary to the comment, the intent behind the State Density Bonus Law definition of "maximum allowable residential density" is to explicitly clarify not to identify the "realistic development capacity of the site." Legislative amendments to the statute that took effect in 2023 explicitly clarified that density "*shall be determined using dwelling units per acre*" and that the maximum density allowed in competing plans applies.

The DBL provides an alternate method for calculating base density *only when* no dwelling-units-per-acre standard applies. "[I]f the applicable zoning ordinance, specific plan, or land use element of the general plan does *not* provide a dwelling-units-per-acre standard for density, then the local agency *shall* calculate the number of units by … [e]stimating the realistic development capacity of the site based on the *objective* development standards applicable to the project, …" (Gov Code, § 65915(o)(6)(A)(B) [emphasis added])

In any event, the applicant has shown that, with relevant waivers, 83 units are developable onsite while still preserving approximately 41 percent of the site in open space.

c. Housing Accountability Act Protections (January 27, 2026 Letter)

The commenter asserts the project does not qualify as an "affordable housing development" under the Housing Accountability Act 65589.5, subdivision (d), such that the Act does not "mandate approval."

In response, the Project does not contend that subdivision (d) of the HAA applies. However, multiple other provisions of the HAA independently apply and significantly constrain the City's discretion to deny the Project or reduce its density, including, but not limited to, subdivisions (f), (j), (o), (k), and (l).

Among other things, the HAA permits a local agency to require compliance with **objective, quantifiable, written development standards** in effect at the time the application (or preliminary application) was deemed complete, but prohibits denial or density reduction based on **subjective, non-quantifiable, unwritten standards**, or standards adopted after submittal. (Gov. Code, § 65589.5, subds. (f)(1), (j)(1), (j)(3).) Moreover, development standards that are subject to waiver, incentive, or concession under the State Density Bonus Law do not constitute valid bases for finding a housing project inconsistent with applicable standards. (Id., subds. (f)(1) and (j)(3).)

Government Code section 65589.5(j)(1) significantly limits a local agency's authority to deny a housing development project or require a reduction in density where the project complies with applicable, objective General Plan, zoning, and subdivision standards in effect when the

application was deemed complete. Under that statute, denial or density reduction is permissible only if the agency adopts written findings, supported by a preponderance of the evidence in the record, demonstrating both that the project would result in a specific, adverse impact on public health or safety, as statutorily defined, and that no feasible method exists to satisfactorily mitigate or avoid that impact other than project disapproval or approval at a lower density.

In addition, if a local agency determines that a project is inconsistent with applicable standards, it must provide timely written notice to the applicant following deeming of the application complete. (Gov. Code, § 65589.5, subd. (j)(2).) The HAA further provides that the receipt of a density bonus, incentive, concession, waiver, or reduction of development standards pursuant to Government Code section 65915 **shall not constitute a valid basis** for finding a housing development project inconsistent with an applicable plan, policy, or standard. (Gov. Code, § 65589.5, subd. (j)(3).)

In sum, the HAA eliminates reliance on subjective standards and generalized community opposition and places the burden squarely on the local agency to justify denial or density reduction based on objective, written standards and evidence in the record. Failure to comply with these requirements exposes the agency to mandatory judicial remedies, including potential orders compelling project approval, statutory penalties, and liability for the petitioner's attorneys' fees. (Gov. Code, § 65589.5, subds. (k), (l).)

d. Compliance with City's Inclusionary Ordinance (January 27, 2026 Letter)

The comment asserts the project "opts out" of complying with the City's inclusionary ordinance.

To the contrary, as admitted in the comment, in compliance with the City's Affordable Housing inclusionary ordinance, the project would provide 5 percent affordable housing onsite and pay the permitted in-lieu fee for the remaining 5 percent.

Agenda Item Position Slip

City of Oceanside

Submitted On:
Jan 28, 2026, 02:11PM EST

Email	3746watts@gmail.com
Council Meeting Date	01-28-2026
Agenda #	26-1200
Subject	Housing proposal near Guajome Regional Park
Position	In Opposition
Name	**First Name:** Lisa **Last Name:** Wood
Oceanside Resident	No
Full Address	
Comments	San Diego Trails Alliance advocates for open space and safe, non-motorized use of trails throughout San Diego County, and as such is aware of the regional, environmental, and historical significance of Guajome Regional Park, a County park in the City of Oceanside. It is clearly important to local community, who commented on the draft EIR indicating that the proposed housing development would be inconsistent with the community character, which is centered on the park. It is also a regional park, of importance to the greater San Diego Community. The EIR asserts that although the project would potentially increase pressure on this and other parks, “it is determined that the combination of proposed on-site open space and private open space, existing public park and recreational facilities in the project vicinity, and proposed future recreational facilities within the City would adequately serve future residents of the project site.” Private open space does not provide for public access, however, and future recreational facilities are not a given. The County was among the many commenters concerned about this and related issues, and per the response provided in the FEIR, “requests justification that proposed housing does not impact County regional trails, trail easements or trails outlined in the Community Trails Master Plan.” The response provided explains that the “closest County regional trail to the project site is the California Coastal Trail, approximately 7.8 miles west of the project site. The closest existing or planned community trail within the Community Trails Master Plan to the project site is planned Trail 19 within the Bonsall Community Plan, located approximately 1 mile southeast of the project site (County of San Diego 2005).” The County has mapped these trails so that development can avoid impacts to planned trail corridors, yet the FEIR

	explains that the “trail has not been constructed and therefore impacts to the planned trail are not discussed in this EIR.” The County requested more details and future coordination with the County DPR team for access, crossing, signage, and maintenance because the project is proposing housing across the street from Guajome Regional Park, however, the response provided in the FEIR did not address this request. SDTA is aware of the pressure to provide housing; however, no one social issue should eliminate consideration of the many important recreational, safety, and resource goals that governments are required by public trust doctrine to consider and protect. At a minimum, coordination with the County on modifications that could protect regional resources should occur before the City commits to development of a highly controversial project.

Stephanie Rojas

From: Rachel Britts <rachelbritts@gmail.com>
Sent: Wednesday, January 28, 2026 12:35 PM
To: City Clerk; City Council; Jennifer Schauble
Subject: Guajome Lake development project

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Hi, my name is Rachel Britts, and I live at 2827 Guajome Lake Road—right in the middle of the dangerous dirt S-curve that the developer is not intending to pave or widen.

Thank you City Council for your willingness to listen to us and our concerns for this development project. I want to reiterate as many others have stated: I am not opposed to wise development. In the almost 25 years that I have lived in Oceanside, I have seen our downtown area develop beautifully through careful planning that has spanned decades, thanks to the wisdom of the Oceanside City Council and Planning Commission. Oceanside deserves that kind of healthy growth. But the growth proposed by this development is not healthy or wise and that is why I am asking the City Council to deny certification of the Environmental Impact Report until our legitimate concerns have been sufficiently addressed by the developers.

I have reached out several times to the developers regarding my concerns and potential solutions, but they have frankly dismissed our conversations, because if the city doesn't hold them accountable, then why would they voluntarily add costs to their scope of work and thus decrease their profits? This is why the city must deny the EIR and require them to fix the flaws before proceeding with their project.

There are many aspects of the EIR that are flawed or insufficient, but my biggest personal concern is the safety of the road that will welcome 830 or more new car trips every day. I know increased traffic is not a concern for the EIR, but safety is supposed to be, and I cannot fathom how the report did not identify the additional safety risks that this development will cause.

There are 4 main "pinch points" on Guajome Lake Road, all of which will be traffic safety liabilities if this many homes are allowed to be built.

Pinch point 1: intersection of Guajome Lake Road and Highway 76.

Guajome Lake Road is VERY narrow at this significant intersection, and the light to turn onto Hwy 76 is long, so even now, cars back up pretty far during the morning and afternoon rushes. Guajome Park's entrance has a curb that juts out significantly into the road and already makes it tricky to navigate, but with the increased traffic from these homes, this will be an increased danger zone. Not to mention, as the only ***paved*** ingress/egress for the neighborhood, it becomes a serious safety consideration in case of evacuation. I lived in Jeffries Ranch during the Lilac fires years ago, which also only has a single ingress/egress (albeit it a wide, PAVED, 4 outbound lanes with expansive views in either direction—in contrast to Guajome Lake Road's narrow, 1 lane, with BLIND view point from both directions!). Our entire neighborhood was evacuated before the fire was even close because of the traffic concerns. Now imagine a fire like what happened on Sunday afternoon this fall got out of hand. Back in September (2025), that entire Guajome/76 intersection was blocked off by a fire!!! So where is the evacuation route?

The developer has previously hinted that, "well, that won't likely happen. We can't build based on some unlikely fears!" But it did happen. Three months ago.

And just ask our home insurance companies about our fire risk thanks to Guajome park and the creek riparian growth. We live in an "increased fire risk area"—to the tune of $7500/year! That's if your home insurance doesn't just cancel you here.

That the EIR neglected to consider these increased risks makes me wonder if they really did due diligence.

Pinch point 2: roadside park parking

This is another narrow stretch of road, utilized heavily throughout the day and even more on weekends by people wanting to enjoy Guajome Park. This stretch of road is the only available parking adjacent to the park. There are often children and dogs and strollers that dart out into the road. With the increased traffic from this development, fatalities are unavoidable. And since the city has been warned, if you do nothing to mitigate this danger, then the city of Oceanside holds liability.

Pinch point 3: the curve at the top of the hill.

This blind curve is already too narrow, with absolutely no shoulder. My car has often been scratched by the cactus and weeds growing on the sides of the road as I try to hug the side to avoid cars that speed around the curve in both lanes. I have caught my breath many times, grateful to have barely escaped yet another head on collision around this curve. This is another area where the increased traffic guarantees increased collisions, and it is surprising the report did not list this as a safety hazard.

Pinch point 4: s-curve on dirt road.

This is my most personal concern, as this is where my house is located, and it is a constant source of concern for me as I pull out of my driveway every day. There is a blind curve to my right and left, and for some reason, cars find it enjoyable to speed through them in both lanes, often in a sort of off-roading glee thanks to the constant deep ruts and bumps on the dirt road (that never fully go away, even after the city's grading crews do their most-monthly maintenance). The road is not wide enough here for 2 cars to pass at normal speed. One car always needs to swerve into the unmaintained embankment to let the other car pass by. I am a very cautious driver, and I cannot pull out of my driveway to the right without encroaching into the oncoming side of the road because it is so narrow around that blind curve. Again, this is another area where an obvious safety concern is egregiously missing from the report. The development spokesperson even accidentally admitted to this when asked why the development's 2 ingress/egress points were placed so close together, and he mentioned the danger of the blind curve!!! They are aware of the danger!!! So please, please, make them address it.

Potential solutions:

I know development is impossible to avoid, so I have been trying to think of potential solutions to these problems.

Holding this development to the already approved half-acre parcels would be one solution. This would be healthy development in line with the original intentions of this area sub plan, that would allow room for an environmental corridor and wouldn't add as many vehicles to the road.

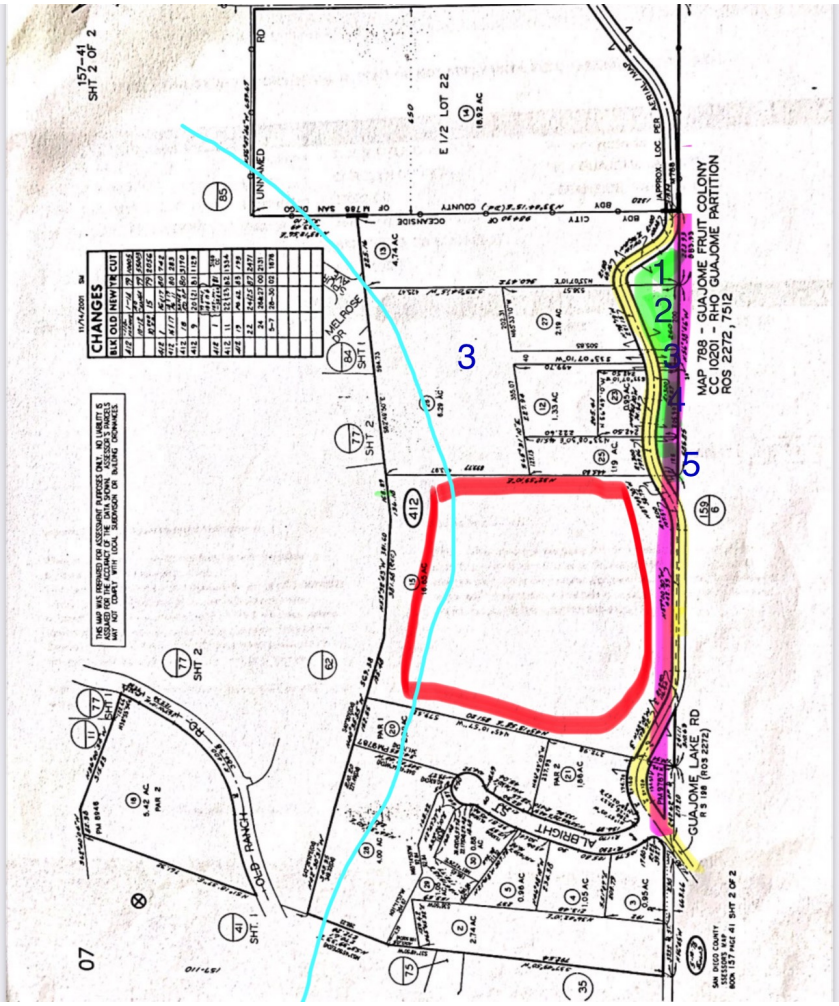
Pinch points 1 and 2 are complex, and I have not discovered a satisfactory solution myself. Please think through this and hold the developer responsible to address these safety issues.

Pinch point 3 is tricky because it would require acquiring land from the owner of the hillside, but that hill could be easily graded to widen the road and add a pedestrian/equestrian sidewalk. (Because this is part of the equestrian overlay.)

(Another Side note on the equestrian overlay: several years ago, we sought to subdivide our 6 acres so that both we and my parents could build homes and live close together. The creek/environmental concerns narrowed the buildable land on our property, but the final dream crusher for us was the city planning office insisting that we include equestrian access paths through our (private, inaccessible) property because we are in an equestrian overlay. They wouldn't budge. And we only wanted to build a house to live near my aging parents. So to hear that this developer is requesting an exception from this overlay…to build an amount of homes that pose a safety threat…is just absurd. The equestrian and park overlays were put in place for a purpose, and should not so easily be waived. They are part of what make this part of Oceanside so special!)

I believe the solution to pinch point 4 is for the city to make use of the road easement on bordering properties and finally straighten out the dangerous S curve. This part of the road was never intended for heavy traffic. What started as a foot path turned horse path following the topography of the land is now being asked to support an amount of cars that it was not made for. Both the developer and the city needs to be held responsible for the safety of citizens. If this development is allowed to cram so many houses onto this undeveloped road, then they must provide the necessary support.

(See image below. Yellow is the current insufficiently developed Guajome Lake Road, pink is how the city should develop the road—straight, wide, paved, with equestrian walkways on the side (like in Jeffries Ranch Community). The red is the proposed development, the green is the other side of all of our properties that the road cuts through (easements). I live at property 3. Even though it looks like a shallow barely curve on this title map, I invite you to experience it from my driveway at about 8:30 in the morning or 3:30 in the afternoon.)



I am sure one of the arguments against this solution is that future developments that border the S-curve will be responsible for fixing that portion of the road. However, that is highly unlikely. Currently, my neighbor with the 2 acres does not have electricity nor sewer on their property, and the cost to develop those 2 acres would already be cost prohibitive WITHOUT the cost of paving and widening the road. My neighbor with the 6 acres is seeking a developer, and we have talked with that realtor, but they also will lose buildable space due to the protected wetlands delineation AND the Melrose Extension, which gives the city eminent domain over a wide swath of that property. So as you can see, it is economically unfeasible for those properties to be developed in the foreseeable future. But meanwhile, this dangerous road that was intended to be a light use path for a few residents, will now carry 1,000 or more vehicles a day with insufficient safety considerations.

I haven't even mentioned the air quality concerns with the excessive dust that already exists, and is about to get a lot worse. This picture was taken a couple of days ago, AFTER the city sent out a water truck to mitigate the dust. There is a constant blanket of dust that sits right above the road and surrounding properties that this sunset lighting revealed in a disturbing way.

Please consider the safety concerns that the EIR omitted. Make this development mitigate the risks, so that the city isn't held liable in the future. It is not a matter of "if" there will be loss of life, but WHEN, and I don't think you want that on your conscience.

Thank you.

—Rachel Britts

760-583-8438

Stephanie Rojas

From: rhondajzl <rhondajzl@cox.net>
Sent: Wednesday, January 28, 2026 11:18 AM
To: City Council; City Clerk
Subject: Please Dont RUIN Guajome Park!

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I have lived in this neighborhood for over 25 years. I ride my bike at Guajome. I hike at Guajome. I walk my dogs at Guajome. I camp at Guajome. It is the last area of "nature" that Oceanside has. We are turning the city into nothing but CEMENT!

MY QUESTION IS TO YOU CITY COUNCIL....how many of you live east of College Blvd?????? Do you even know how AWFUL the traffic is? We wait at the stoplights on the 76 for 3 or 4 or 5 or 6 rotarions. TOO MUCH TRAFFIC AND THE ROADS CANNOT HANDLE IT! Adding 80+ homes in that area will be completely unbearable.

In closing, I have a disabled son that I have to drive to his bowling keague. I have to drive him to his hiphop classes. I have to drive him to his Faith Group meetings. There is NO BUS STOP east of S. Sante Fe. No bus stop in Jeffries Ranch! I have fought for 16 years to get one. But I have given up.
Please Quit being money hungry for property taxes amd stop building in Oceanside!

Angry as hell,
Rhonda Morel

Yahoo Mail: Search, Organize, Conquer

Stephanie Rojas

From: Robin Robinson <r.robinson1113@att.net>
Sent: Wednesday, January 28, 2026 9:17 AM
To: City Council; City Clerk
Subject: Support for the Guajome Lake Homes Project

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Dear Oceanside City Council,

Thank you for opportunity to provide comments in support of Rincon Homes' Guajome Lake Homes project. I believe this residential development a balanced approach to not only addressing our local housing crisis but also prioritizes environmental preservation and community safety.

* Housing is needed! This development will provide 83 single family homes designed for working families and professionals, as well as four for-sale affordable homes for very low-income households.

* Infrastructure improvements are important! Currently, a portion of Guajome Lake Road is an unpaved dirt road. This project commits to fully paving the road along the project frontage and beyond to Albright St., adding sidewalks, and implementing traffic calming measures. This will improve accessibility for residents and ensure safe access for our first responders.

* I'm impressed that the Rincon Homes will preserve 7 acres as open space and placement of homes near existing infrastructure minimizes impacts on sensitive habitats.

* The sources indicate that the Guajome Lake Homes project will result in no significant environmental impacts to Guajome Regional Park and will instead provide new residents who will be a positive addition to the park community.

This developer has done a good job of thoughtful planning and design that will provide much needed attainable housing and vital infrastructure upgrades for Oceanside. I hope that you will vote to approve this project. Thank you.

I look forward to hearing good news from today's meeting.

Robin Robinson

Stephanie Rojas

From: jackie graziano <pudntaine@gmail.com>
Sent: Wednesday, January 28, 2026 12:11 PM
To: City Council; City Clerk
Cc: guardguajome@yahoo.com
Subject: A Plea from the Heart of This Land: Deny Certification of the Environmental Impact Report (EIR) for the Guajome Lake Homes Project

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Jackie Graziano
4580 Blackwell Rd, Oceanside, CA 92056
(760) 807-1555
pudntaine@gmail.com

January 28, 2026

Dear Council Members,

I write to you today not merely as a resident, but as one who has walked these lands and breathed this air for 72 years. I have seen the seasons turn, watched children grow, and witnessed the enduring spirit of Guajome. It is with a heart full of deep concern and a lifetime of understanding that I urge the City Council to deny certification of the Environmental Impact Report (EIR) for the proposed Guajome Lake Homes project. Guajome Regional Park and its surrounding wild spaces are more than just parcels of land; they are a living, breathing entity, a sanctuary that has sustained us for generations, and this EIR, in its current form, does not honor its sacred trust.

My years have taught me that true growth comes from harmony, not from imbalance. While I understand the need for shelter, it must not come at the cost of the Earth's health or the well-being of our community. The current EIR for the Guajome Lake Homes project contains profound shortcomings that betray its purpose to truly assess and protect this precious environment. These critical oversights speak to a disconnect from the deep wisdom of the land itself:

Regarding the Safety and Sacredness of All Life:

Guajome Lake Road's Ancient Path: I have known Guajome Lake Road through countless sunrises and sunsets. Its narrow, winding, unpaved stretches are not meant for the burden of an additional 830 daily car trips. This is a path, not a highway, and to force such change is to invite danger for all who travel it, human and animal alike.

The Air We Share: Leaving 800 feet of this road unpaved with increased traffic means the very air we breathe will be choked with dust. This impacts the visibility for drivers, yes, but more deeply, it harms the

lungs of those who live here, the equestrians, and the quiet park users who seek solace in nature's clean breath.

Safe Passage in Times of Trial: My memory holds the wisdom of many seasons, including those of fire. To proceed without clear, safe evacuation routes for our families, our first responders, and our beloved horses during a wildfire, especially when parts of the road do not meet basic safety codes, is to disregard the fundamental need for protection.

Honoring Every Footstep: I have watched horses and riders, and families on foot, find peace along Guajome Lake Road and its trails. The EIR regrettably overlooks the profound safety risks that increased traffic and dust will bring to these gentle souls, disrupting their ancient rhythms and sacred spaces.

Regarding the Delicate Balance of Wildlife and Habitat:

The Weaving of Life: The EIR inadequately perceives how this project would tear at the delicate fabric of wildlife movement and habitat connecting Guajome Regional Park, Jeffries Ranch, and the surrounding open spaces. This is about preserving the very soul of this ecosystem, a gift passed down through time.

A Whisper of Protection for the Gnatcatcher: While acknowledging impacts to the Federally-protected California Gnatcatcher, the EIR's reliance on deferred and off-site mitigation feels like a hollow promise. It fails to truly demonstrate a genuine commitment to safeguarding the ancient home of this precious bird.

Truth from the Earth: The EIR's claim that off-site mitigation reflects the U.S. Fish and Wildlife Service's preference lacks the clear, verifiable evidence that the Earth herself demands for such assertions.

Regarding the Spirit of the Land and Its Uses:

Erosion of Our Heritage: The project proposes to disregard the vital Equestrian Overlay protections. The EIR tragically fails to understand the deep wisdom and history embedded in these safeguards, which were lovingly established to preserve the rural and equestrian heart of this area for all time.

A Disharmonious Vision: The EIR's assertion that this project aligns with surrounding land uses simply does not resonate with my 72 years of observation. Our community has cherished its large-lot equestrian homes; to introduce much smaller, higher-density lots is to create a profound discord that clashes with the established spirit of the land.

Regarding the Purity of Guajome Lake's Waters:

The Lake's Silent Plea: Our sacred Guajome Lake is already an impaired waterbody, a testament to past burdens. The EIR, however, fails to offer a clear understanding of its current health or adequately analyze how stormwater runoff from this project would further wound its fragile waters.
Unheeded Warnings: Even the project's own stormwater plan admits its controls fall short. To then conclude that impacts would be insignificant without robust, additional measures is to ignore the Earth's quiet warnings and invite deeper harm to this vital aquatic haven.

Regarding Mindful Growth for Future Generations:

The Unseen Seeds of Change: The EIR gravely underestimates the growth-inducing impacts of extending sewer infrastructure near Guajome Regional Park. To pave the way for future, unplanned sprawl without a holistic vision is to disregard the long-term well-being of this cherished landscape, a future we hold in trust for our grandchildren.

Regarding the Sacred Views and Unseen Beauty:

A Blind Spot to Beauty: The project site lies within the Scenic Park Overlay, a designation born from a deep desire to protect the invaluable natural gifts near Guajome Regional Park. The EIR, regrettably, fails to see or honor the project's compliance with this vital purpose.

The Soul's Nourishment: The EIR's claim that this area lacks scenic value is a profound disconnect from the truth I have witnessed for decades. It disregards the inherent beauty that nourishes our souls and the open vistas that City policy specifically intends to preserve for all to cherish.

Regarding the Interconnectedness of Our Community:

The Circle of Voices: The City’s General Plan wisely calls for seeking counsel from the Guajome Regional Park Area Planning and Coordinating Committee. The EIR regrettably does not disclose that this crucial conversation did not occur, yet it still claims consistency. True harmony demands that all voices, all perspectives, be heard and honored.

Beyond the Lines We Draw: Guajome Lake Road and its paths flow through many lands, through Oceanside, Vista, and the County. The EIR critically fails to understand how this project's impacts would ripple across these boundaries, affecting our neighbors, our shared emergency access, and the very pathways we rely on.

The Unfinished Story of Impacts: The EIR's analysis of cumulative impacts is incomplete, a story half-told. It omits crucial elements, such as the Camino Largo housing project, which will inevitably add its weight to the path of Guajome Lake Road. To truly understand the whole, we must listen to all the chapters.

To certify this EIR in its current form would be to betray the trust of generations and inflict irreversible harm on a cherished natural sanctuary, diminishing the quality of life for all beings in our interconnected community. We implore you to listen to the wisdom of the land and the heartfelt concerns of those who have been its guardians for so long.

Therefore, I respectfully request that the City Council deny certification of the Environmental Impact Report (EIR) for the Guajome Lake Homes project. Let us seek a truly adequate, compassionate, and comprehensive environmental review that genuinely addresses these profound concerns before any further steps are taken towards this development.

Thank you for holding the well-being of our Mother Earth and our community in your hearts.

With a spirit of respect and hope for a balanced future,

Jackie Graziano

Stephanie Rojas

From: Jessamyn Keenan <jessamynk@mac.com>
Sent: Wednesday, January 28, 2026 10:57 AM
To: City Council; City Clerk
Cc: guardguajome@yahoo.com
Subject: Re: Item 16, Oceanside City Council Agenda, January 28, 2026 Guajome Lake ProjectOppose Adoption of EIR, MMR & Overturn Planning Commission Resolution No. 2025-P20
Attachments: Guajome Lake Road Project_012626.pdf

EXTERNAL MESSAGE: Use caution when opening attachments, clicking links, or responding. When in doubt, please contact CustomerCare@oceansideca.org

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Dear Oceanside City Council - Attached is a letter for your review regarding the Guajome Lake Homes project appeal on the 1/28/26 agenda.

Thank you!
Jessamyn Keenan
562 Hoover Street
Oceanside

Equestrians on their way in and out of Guajome Lake Park on Guajome Lake Rd.July 2025.

January 26, 2026

Dear Oceanside City Council,

I am an Oceanside resident and have been boarding my horses on Guajome Lake Road for over 15 years. We love riding through Guajome Lake Park and ride there from our barn along the length of Guajome Lake Road several times a week.

The proposal to remove the protections from this parcel has come to the attention of the San Diego Equestrian Community. Maintaining safe access to the park for horse and rider must be a priority with any new development in the area. The current project EIR does not address increased safety risks for equestrians using this road as an established trail access to the park.

This parcel is in a very special protected location close to Guajome Regional Park (a San Diego County Park) and an Equestrian Community in Oceanside. SO & EQ Zoning Ordinances currently apply to development of this parcel.

We strongly oppose removing the protections that were put in place to protect a century of equestrian presence and decades of planning documents that recognize the equestrian community's needs, and protect & preserve the wetlands, birds, and animals that call Guajome Park home.

The City of Oceanside must honor its promise to the public to preserve special zoning districts that have been created to protect Guajome Regional Park, and the Equestrian Residents in the area.

Safety of horses and riders is a top concern with any increase to current traffic on Guajome Lake Road. A trail would be required along the length of the road to ensure the safety of horses and riders,

as this road is currently the established trail access used by equestrians to enter the park – from the park entrance at Hwy 76 to Osborne St.

Example of a safe roadside trail

Equestrian Overlay District Zoning Ordinance

The specific purposes of the EQ Equestrian Overlay District are to:

> *A. Provide for recreational opportunities by establishing an equestrian trail network around Guajome*
> *Regional Park and the San Luis Rey River within the Guajome Neighborhood Planning Area.*
>
> *B. Provide appropriate design standards and criteria for the keeping and protection of horses on private property.*
>
> *C. Create, enhance, and protect the equestrian and rural atmosphere within the overlay area by integrating open space areas and urban areas with horse trails.*
>
> *D. Achieve a visually pleasing and compatible relationship between buildings and accessory structures, horse trails, open space and planting areas, and the natural environment by providing appropriate buffers between equestrian and non-equestrian uses.*

Clearly the protection of Guajome Park and the Established Equestrian Community is expressed in this Zoning Ordinance.

We need the City to enforce all obligations of the property owner to adhere to all zoning regulations, the Scenic Park Overlay District, and the Equestrian Overlay District requirements that protect Guajome Regional Park, its wildlife, and the safety of our Equestrian friends and neighbors.

Terminating these Zoning Ordinances would set a dangerous precedent. It would signal that no zoning district ordinance agreement is safe, that long-standing commitments to communities, the environment and future generations can be undone when politically or financially convenient.

We feel you would be doing a great disservice to all Oceanside & San Diego County residents as it affects current and future generations by removing the protective zoning ordinances that have been placed on this parcel. You have the ability, and responsibility, to ensure that this project makes sense for the surrounding community and that we end up with a project that will benefit our community.

Sincerely,
Jessamyn Keenan
562 Hoover Street
Oceanside
92054

Stephanie Rojas

From: John Bottorff <j@cleanearth4kids.org>
Sent: Wednesday, January 28, 2026 10:33 AM
To: City Council; City Clerk
Subject: Council Item #16 Comment: Deny EIR certification for Guajome Lake Homes
Attachments: Oceanside Guajome Lake Homes EIR Comment Letter FINAL.pdf

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Our comment opposing the EIR certification is attached.

Thank you,

John Bottorff
CleanEarth4Kids.org
949-439-5459
J@CleanEarth4Kids.org