



September 28, 2021

City of Oceanside
Mayor and City Council
Sent via Email

Subject: Comments on Draft Community Vision for October 6, 2021

Honorable Mayor and City Council:

This draft Vision for the future Oceanside gives us lots to look forward to, but it is clear that a lot of work is needed to get us there.

We greatly appreciated the emphasis on smart growth, and the goal of achieving a more sustainable future that conserves our resources and builds on our assets.

But to achieve that more sustainable future this Vision statement needs to:

1. Better value and protect our natural resources
2. Acknowledge and respond to the climate crisis as a real priority
3. Properly reflect the community's priority to preserve the South Morro Hills farmland

The following are some more specific comments:

Better value and protect our natural resources

- ✓ After over 20 years, it is time to commit to finalize and adopt the Oceanside Sub Area Habitat Conservation Plan (SAP). Oceanside is one of 7 cities in north county that is subject to the conditions in the regional conservation plan, the MHCP, that was adopted by SANDAG in 2003. This plan assumed each city would adopt their own detailed conservation plan. Oceanside's has been through multiple drafts since 1999. These plans are essential to ensure that the over 60 species of plant and wildlife that are under threat of extinction are protected. Adopting a program level plan will reduce the administrative burden on individual permit processing for many developments. This is the same process the city is using with the CAP—if developers comply with provisions of the program level CAP, they avoid much more onerous individual project level conditions. The SAP ensures that the most important lands are preserved and helps provide certainty for developers— a win-win for everyone.
- ✓ Page 4 seems to be missing most of our protected natural resources. The words used are not correctly describing the full range of resources. It would be better to use words like natural lands and waters, native plants and wildlife, and biodiversity. Also, please clarify that

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social/environmental justice includes equal access to green spaces for both active use like parks and passive use like trails in natural areas.

- ✓There is a general statement that there will be “ample and appropriately programmed open space.” But all open space is not the same. Protection of our natural lands has been incorporated into state and federal law (particularly the Endangered Species Act), and years of regional planning to protect those species. The SAP clarifies the minimum number of acres of natural lands by habitat type that are required to be acquired and restored, and includes guidelines for allowed uses. This is another reason why adopting the SAP needs to be included as part of the General Plan update.
- ✓The Vision needs to be clear that protecting natural resources is a priority. Instead, it says it will “balance land uses to meet multiple needs”. This is not always possible with our natural lands — or certainly not without a lot of care. The on-going conflicts between public use and protection of sensitive habitat is a critical one. If the objective is “balance” then natural lands continue to be damaged by both legal and illegal public use (like illegal trail building). If protecting natural resources—land, water, plants, **and** wildlife is actually a priority, then it needs to be prioritized—not “balanced.”
- ✓Page 13, item 10 has a narrow description of natural lands that is not consistent with the conservation plan. It is not just undeveloped hillsides and ridgelines. Low lands, particularly along creeks are critical, and the entire watershed needs to be considered. Wildlife corridor linkages are critical to protecting biodiversity—and the integrity of the regional conservation plan—and unfortunately many of those are already compromised by existing development.
- ✓Page 13-item 10- The city is not just “supporting” the regional conservation plan— they are a required participant and have to comply with conditions in the adopted MHCP. They should see themselves as partners, with their own adopted SAP.
- ✓Page 13, item 10 trivializes protection of the natural resources by characterizing it as a “sense of spaciousness.” Natural lands provide numerous values for quality of life and pocketbook. Natural wetlands preserve water quality at a lower cost than building concrete treatment systems. Natural lands cost less for a city to manage than most other land uses. Natural lands can include trails that are part of healthy quality of life and support reduced auto use. There are numerous beneficial uses of protecting natural lands that need to be better integrated in this document.

Acknowledge and respond to the climate crisis as a real priority

- ✓There is nothing in this Vision that reflects the critical importance of addressing climate change. Cities across this country are adopting “climate crisis” resolutions and ensuring that consideration of climate impacts will be incorporated into all local programs and actions.
- ✓Page 14 item 12 is an opportunity to clarify the importance of integrating land use and transportation. That **integration** will reduce VMT and the resultant traffic congestion, AQ impacts and GHG. What does “promote cost savings for residents and the business community” have to do with GHG reduction?

- ✓ Impacting new development alone will not achieve the GHG reductions that are needed, in the time frame required to comply with state law. The Vision needs to include that this will be done both through new building codes/siting and creating transportation choices and by retrofitting the existing buildings/systems. And it needs to be emphasized that timing is critical in implementing these changes so that we do not experience the worst impacts of climate change. The CA Green Building codes are only updated every 3 years and the next ones won't take effect until January 2026 so cities have to be more aggressive now given the lifespan of buildings.
- ✓ "Energy independence" is not really the goal—it should be reducing/eliminating the use of fossil fuels.
- ✓ Need to add completion of the Sea Level Rise Action Plan. The SLR vulnerability study was done several years ago. It laid out a whole range of actions that could be taken but no decisions have been made about what actually will be done. Yet recently, the city approved spending millions of dollars to put sand on beaches that may be under water in a few years. We must adopt a SLR action plan- and begin to implement it.

Properly reflect the community's and State's priority to preserve the South Morro Hills farmland

- ✓ Preserving agricultural land for agriculture needs to be a clearly stated priority. It was a clear priority in the survey- 74% of all respondents and 84% of farmers/ranchers made it the top priority. The vision to protect agriculture needs to be better integrated with the detailed programs and policies in the SMHCP which in theory are supposed to help carry out the Vision.
- ✓ Our agricultural lands provide important secondary value toward the preservation of our native plants and wildlife. They have received special treatment in the city's draft conservation plan (SAP) because of their contribution to local and regional conservation plans. Proximity to the San Luis Rey River, provision of wildlife movement corridors, scattered patches of sensitive habitat, and the value of agricultural lands for cover and forage all contribute to this. There are specific conditions included in the SAP that must be met when these lands are converted to other uses.
- ✓ Agricultural lands are specifically called out in SB 330 as exempt from conversion to housing. This is just one of many actions the state has taken to preserve the remaining agricultural lands in the state for agricultural uses.
- ✓ The statement that agriculture faces development pressure "as demonstrated by small scale residential subdivisions." is unclear. What are you actually trying to say? Small residential subdivisions are what has been proposed with the cluster housing included in the SMHCP. It is those policies that are adding to the development pressure on agriculture. This is another inconsistency between the Vision, the SMHCP and the rest of the General Plan.

Please direct staff to better address these three issues, and ensure that the Vision for the future Oceanside reflects the community's vision to preserve our priceless natural resources and protect the farmland in South Morro Hills.

Sincerely,

Diane Nygaard , On Behalf of Preserve Calavera