

Comments from BVAS, Nov 3, 2019, sent via email to Oceanside City Council

Dear Mayor and Council Members,

I am writing on behalf of the Buena Vista Audubon Society. We opposed the North River Farms development as originally proposed and remain opposed to it after recent changes made by the developer. Our reasons include the following:

- 1) Even with a reduction in housing units and the offer of various amenities, the project represents urban sprawl. This type of development locates residences a distance from jobs, services, and infrastructure, resulting in long drives, traffic congestion and increased greenhouse gas emissions. It is not consistent with good planning practices and is discouraged in the Oceanside General Plan. Staff has stated that there is sufficient land with residential zoning in the more urbanized parts of Oceanside to fulfill the State housing mandate.
- 2) The project would increase greenhouse gas emissions over what was anticipated in the Oceanside Climate Action Plan, with offsets proposed which are distant, more often than not unreliable, often poorly monitored, and limited in duration. This is not acceptable as we all need to be concerned about climate change and its effects such as drought, fires, extreme weather conditions, flooding, and sea level rise.
- 3) The General Plan which designated the Morro Hills area as agricultural land was developed with extensive input and effort from City residents. That is appropriate. The North River Farms project now proposes housing and commercial development in this agricultural area. If changes are to be made to the General Plan, there should first be a planning study involving the joint work of staff and community members. However, in this case, the developer is offering \$1 million for a planning study of South Morro Hills only after North River Farms project is approved. Good community planning occurs prior to development, not after entitlements have been locked in.
- 4) The EIR states that the project still has significant and unmitigated environmental impacts regarding growth inducement and traffic congestion, and we don't believe there are overriding findings that the Council can make to justify approval of the EIR and this project. In addition, considering traffic congestion, resident evacuation could be compromised in case of wildfire, thereby endangering public safety.

We strongly urge you to deny this project and to encourage development that is environmentally sound and sustainable.

Sincerely,

Joan Herskowitz  
Conservation Committee  
Buena Vista Audubon Society