



CITY OF OCEANSIDE

DEVELOPMENT SERVICES DEPARTMENT / PLANNING DIVISION

November 10, 2021

JPI Development LLC
Attn: William Morrison
12250 El Camino Real, Suite 380
San Diego, CA 92130

Subject: Application Review Committee (ARC), Third Submittal for Ocean Creek (formerly Jefferson/Oceanside) (S. Oceanside Blvd and Crouch Street; D20-0004 and CUP20-00005; APN: 151-27-50, -52, -53, and -56)

Dear Mr. Morrison:

Email: william.morrison@jpi.com

The City of Oceanside Application Review Committee (ARC) has reviewed the third submittal of the application consisting of the following entitlement requests:

Development Plan (D20-00004), Conditional Use Permit (CUP20-00005), Conditional Use Permit (CUP21-00012), and Variance (V21-00004)

The Committee evaluated the application for completeness pursuant to Government Code Section 65943 to determine whether any additional information needs to be submitted in order to determine your project's compliance with the City's General Plan, Zoning Ordinance, and other regulatory documents. At this time, the Committee has determined that the application remains **incomplete**. Additional information regarding the proposed use is needed in order to continue to process the subject application. Staff comment on the application is either listed below, or enclosed as attachments to this correspondence.

PLANNING:

1. Greenhouse Gas Assessment
 - a. On Page 28 of the reports states that the project population is 693; however, service population in the report and in the Market Review and Fiscal Impact Analysis is stated at 673. Is project population different than service population? If yes, please explain. If no, please correct.
 - b. It is still unclear how ADT was calculated. Staff suggests incorporating the project trip generation information from the Local Transportation Study.
2. Air Quality Report
 - a. Report was not included with the third submittal. Prior comment: The Report should include Appendices.
3. Description and Justification Letter
 - a. Page 1: While the D&J states that there is a proposed trail within the Loma Alta Creek buffer, this trail is not depicted on plans. Remove reference of this trail on the D&J.

4. Architecture

- a. Repeat Comment: Staff recommends the project go through the Design Review Committee with members of the Planning Commission. This process can help address design concerns that could result in Planning Commission denial or continuation of the proposal. If you would like to participate, Planning staff will coordinate a date and time.

5. Parking

- a. The required number of parking spaces noted in the study is not consistent with applicable parking standards outlined in the Zoning Ordinance. The project is required to provide 582 spaces (511 residential spaces, 50 guest residential spaces, and 11 retail spaces). The breakdown in the report (234 spaces for 1-bedroom units, 268 spaces for 2 or 3 bedrooms and 59 spaces for guests) also does not match the plan set or required code (parking ratios per Article 31).
- b. On Page 10 there is a summary of TDM measures, which does not include the unbundling/car-free living option. This should be included in the summary.
- c. Page 5 states 11 retail spaces and 467 residential spaces, but plans state 14 guest and future tenant and retail spaces and 464 residential spaces. Please correct.
- d. The report states that there are additional parking demand management measures in development, including Transportation Demand Management measures that could further reduce parking demand. It is difficult for staff to evaluate, and ultimately support, the request to deviate from applicable parking requirements without a complete understanding of what these measure entail. These additional measures must be specified prior to the project being deemed complete.
- e. The PIF and Local Transportation Analysis use a 5% and 10% daily trip reduction from SANDAG's *(Not So) Brief Guide of Vehicular Traffic Generation Rates*. These rates are not mentioned in the parking analysis, nor is there any analysis of why these trip reduction rates are applicable to this project.
- f. Table 14-1 of the Local Transportation Analysis and the parking summary on the plan set do not mention the required guest parking as specified in the Zoning Ordinance, Section 3103. Please acknowledge this requirement and provide a basis for a reduction in the number of required guest parking spaces.
- g. Staff recommends that the project use SANDAG's VMT Reduction Calculator Tool.

6. Biological Resources

- a. Staff recommend that conceptual approval of project impacts and mitigation from the federal and state wildlife agencies be obtained prior to the project being deemed complete. Please be aware that project approval will be conditioned to obtain any necessary federal and/or state permits prior to issuance of a grading permit.

7. Conceptual Grading Plan

- a. Page 21 states that the project design does not contain residential structures within 100' of Loma Alta Creek. This is not accurate, as there are residential structures within 100' of the creek.
- b. Consistent with the recommendation of the geotechnical report, project approval will be conditioned that structures within the liquefaction area should have a mat foundation or conventionally reinforced ribbed mat foundation.
- c. Geotechnical report states that trees within the liquefaction area should be a minimum distance equal to ½ mature height from foundation. Landscape plans show several tree species that do not meet this recommendation.
- d. Draft condition of approval: Geotechnical report states that landscape irrigation drainage should be directed away from structure foundation.
- e. Repeat Comment: The proposed grading plan shows a soil nail retaining wall, max height of 20'. Softening of the wall with step backs and vegetation is strongly encouraged.

8. Community Outreach:

- a. The community outreach report does not meet the intention of Policy 300-14, which is to increase public awareness and promote public participation in proposed land development projects.
- b. The plan that was submitted in June, 2021 stated that the project would conduct a virtual public meeting with meeting invitation/notice going out to the addresses within 1,500 feet of the project site. The report submitted indicates that the project team is relying on the Notice of Application that the City send in March, 2020 as the enhanced notification provided to residents within 1,500 feet. This is not acceptable, as Policy 300-14 specifically states that enhance notification is intended to supplement and enhance existing notification requirements. The project should conduct separate notification, specifically for a community meeting.
- c. The report states that the project team '[has] met with a number of Fire Mountain residents.' The report should specify the exact number of residents with whom the project team has met and provide names and contact information for these residents.
- d. Due to a high number of inquiries from community members, Planning staff started a project-specific interested parties list. That list was shared with the project team in the spring of 2021. It is the City's expectation that individuals on this list will be directly contacted by the project team to provide information on the project, field their questions, and extend invitations to outreach events.
- e. Repeat Comment: Outreach materials should include information regarding the Project's CEQA approach.
 - i. New Comment: It should be noted that while staff recommends introducing the CEQA approach to the public during the enhanced notification, enhanced community notification of the project is not the same as a CEQA scoping meeting and cannot be replaced with that meeting.

- f. Repeat comment: Additional Community Outreach materials can be shared with City staff prior to an official resubmittal of the project in order for the Project to commence and complete additional outreach per the comments above.
 - g. Repeat comment: Provide dates and time of all community meetings to City staff.
 - h. Repeat comment: Once outreach has been completed, provide a written report consistent with the City's Enhanced Notification Policy.
9. Cultural Resources Inventory Report
- a. Please provide a version of the report with all confidential information removed that may be shared with the general public.
10. SB 330:
- a. Advisory comment: City received the SB 330 application on June 14, 2021. The project is thus subject to regulations and fees in place on this date.

BUILDING:

No changes: Building Department has approved this project with condition. Should you have any questions regarding their comments, please contact John Gomez, Assistant Building Official, at (760)435-3524.

LANDSCAPING:

No change: Project has been deemed complete, if further modifications are made to the proposed site in either architecture or engineering, another landscape review shall be required. Should you have any questions regarding their review, please contact Harry Grove, Landscape Architect, at (760) 435-5090.

ENGINEERING:

Project has been returned with comments, please see Attachment No. 1. Should you have any questions regarding their review, please contact Fred Tafaghodi, Associate Engineer, at (760) 435-5113 and/or Paul Pham, City Development Engineer, at (760)435-5030.

FIRE:

Project has been returned with comments, see Attachment No. 2. Should you have any questions regarding their review, please contact Tim Rise, Fire Plans Examiner, at (760) 435-4308.

SOLID WASTE:

Project has been approved. Should you have any questions regarding their review, please contact Annika Andersen at (760) 435-5818.

WATER UTILITIES:

Project has been returned for corrections, see Attachment No. 3. Should you have any questions regarding the status of the Water Utilities Department's review, please contact Bryan Kallenbaugh, Water Associate Engineer at 760-435-5860.

PUBLIC WORKS:

Project has been deemed complete.

POLICE:

Review is presently under way, status will be provided as soon as possible. Should you have any questions regarding their review, please contact Sgt. Greg Stahley at (760) 435-4883.

TRANSPORTATION:

Project has been returned with comments, see Attachment No. 4. Should you have any questions regarding their review, please contact Tam Tran, Transportation Planner, at (760) 435- 5115.

GEOTECHINICAL:

See Engineering Division comments.

STORMWATER:

Project has been returned with comments, please see Attachment No. 5. Should you have any questions regarding their review, please contact Michael F. Strizic, City Development Engineer, at (760) 435- 5564.

SUMMARY:

Other Departments which are continuing their review will provide those to you as soon as they are available. Please respond to all comments and resubmit the application package with appropriate changes which address Departmental review comments.

Please be advised that you may direct any questions regarding these review comments to the City staff person who provided them, with the understanding that any written correspondence or e-mail related to this project application needs to be copied to the Planning Division's project manager who is responsible for overall project management. As a general rule, please include the City's project planner in any meetings and/or discussions with other City staff regarding the proposed project. If the City's project manager is not available to attend meetings or participate in such discussions at any time, please provide the project manager with a written meeting summary including any specific staff direction and/or

recommendations which resulted from such meetings or discussions.

Once the necessary revisions have been completed which satisfactorily address the above Application Review Committee (ARC) member's comments, please submit a revised application package including the following items along with a cover letter which, preferably in a matrix format, which describes specifically how each comment has been addressed:

- 1 - A response to comments letter outlining how each comment has been addressed.
- E-copy of plan sets including conceptual design details.
- E-copy of all reports

The City is only accepting electronic submittals, please email me directly when you are ready to resubmit.

Please don't hesitate to contact me with any questions regarding the processing of this application. I look forward to working with you and your project team to assure that your project proposal both meets your objectives as well as those of the City's General Plan and Zoning Ordinances, and to keep the proposal moving forward through the discretionary review process.

Should you have any additional questions, feel free to contact me at (760) 435-3561 or scervantes@oceansideca.org.

Sincerely,

Stefanie Cervantes

Stefanie Cervantes
AICP Candidate
Associate Planner