

CALIFORNIA COASTAL COMMISSION

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F11a

City of Oceanside LCP Amendment No. LCP-6-OCN-19-0146-3

September 10, 2021

CORRESPONDENCE

From: [Leslie, Kanani@Coastal](mailto:Leslie.Kanani@Coastal)
To: [Leslie, Kanani@Coastal](mailto:Leslie.Kanani@Coastal)
Subject: FW: Public Comment on September 2021 Agenda Item Friday 11a - City of Oceanside LCP Amendment No. LCP-6-OCN-19-0146-3 (Transit Overlay District).
Date: Tuesday, September 7, 2021 4:35:20 PM

From: Christopher Pederson <cpedersonlaw@gmail.com>
Sent: Friday, September 3, 2021 11:08 AM
To: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>
Cc: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Schwing, Karl@Coastal <Karl.Schwing@coastal.ca.gov>
Subject: Public Comment on September 2021 Agenda Item Friday 11a - City of Oceanside LCP Amendment No. LCP-6-OCN-19-0146-3 (Transit Overlay District).

Dear Chair Padilla and Commissioners:

The Commission should certify the City of Oceanside Transit District Overlay LCP amendment as submitted. In light of the climate and housing crises, the Commission should be facilitating multifamily housing in locations with abundant transit service and a mild climate. Unfortunately, staff's proposed suggested modifications do the opposite. Furthermore, they conflict with Coastal Act policies regarding transportation, parking, concentration of development in urban areas, and energy consumption.

The Oceanside Transit Center has an unusually rich concentration of regional and local transit service. The Amtrak Pacific Surfliner provides regular all-day service to San Diego, Orange County, Los Angeles, and Santa Barbara (and more limited service to San Luis Obispo). Metrolink commuter rail routes connect Oceanside to Orange County, Los Angeles, and the Inland Empire cities of Riverside and San Bernardino. The Coaster commuter rail service connects Oceanside to San Diego and the beach communities in between. The Sprinter rail line connects Oceanside to Vista, San Marcos, and Escondido. Multiple NCTD Breeze bus routes connect the Transit Center to neighborhoods throughout northern San Diego County.

In other words, people who live close to the Oceanside Transit Center can easily take transit to large portions of southern California and can easily walk to Oceanside's downtown. And people from large portions of southern California can easily take transit to visit Oceanside's shoreline.

Areas within walking distance of the Transit Center are precisely the kind of areas where the Commission should encourage abundant multifamily housing. Doing so helps to concentrate development, promote transit ridership, reduce driving, and reduce energy use as required by the Coastal Act. (See Pub. Resources Code, §§ 30250(a), 30252, 30253(d).) The LUP policies quoted in the staff report reiterate these mandates. Complying with these Coastal Act and LCP requirements also helps to reduce the greenhouse gas emissions that fuel climate change and that thereby imperil a whole host of coastal resources.

The proposed suggested modifications would require new housing located west of the railroad

tracks to comply with expensive and burdensome parking requirements that are likely to reduce the amount of housing provided, if not thwart it entirely. Notably, however, the staff report does not cite any LUP policies that prohibit reduced off-street parking requirements in areas close to transit that are west of the railroad. In contrast, the report cites multiple policies that call for supporting public transit and reducing vehicle miles traveled and energy consumption. Concentrating multifamily housing close to transit is necessary for accomplishing all of those policies. The Commission should therefore reject the suggested modifications that prohibit reduced parking ratios and use of adjacent on-street parking for housing located west of the railroad.

The report stresses the need to protect Oceanside's abundant public parking supply for coastal access. The report admits, however, that public parking lots are 20 percent vacant even during periods of peak parking demand. Oceanside can therefore easily accommodate some tightening of parking supply without impeding public access via automobile. In any event, Coastal Act section 30252 requires new development to provide "adequate" parking only when it lacks public transportation. The Commission should construe the LCP consistently with the Coastal Act and allow reduced parking requirements throughout the Transit Overlay District. (*See McAllister v. Cal. Coastal Comm.* (2008) 169 Cal.App.4th 912.)

The report also recommends a modification to address the potential for increased traffic congestion in the downtown area. The report fails to explain how the moderate congestion levels that occur at "LOS D" prevent access to the coast. The report does not identify any LUP policies that require mitigation measures for localized traffic congestion. The Coastal Act requires vehicle miles traveled to be minimized, but also does not address localized traffic congestion. (Pub. Resources Code, § 30253(d).) Recent changes to CEQA have also shifted the focus away from traffic congestion and towards minimizing VMT. (Pub. Resources Code, § 21099; CEQA Guidelines § 15064.3.) The modification addressing potential traffic congestion is therefore unwarranted.

The modification also has the potential to create significant Coastal Act problems. Traffic congestion mitigation measures typically take the form of widening streets, adding turning lanes, restricting crosswalks, timing traffic lights to maximize vehicles throughput, and other similar measures. All of these measures make walking and bicycling less safe, attractive, and convenient. Discouraging walking and bicycling, however, directly conflicts with Coastal Act and LCP requirements to minimize VMT and energy consumption and to encourage non-automobile circulation.

If the Commission decides to impose the traffic congestion modification, it should revise it to require that any mitigation measures enhance walkability, bikeability, and public transit operations.

Thank you for your consideration of my comments.

Sincerely,

Christopher Pederson