

**CALIFORNIA COASTAL COMMISSION**

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# Th18a

**LCP-6-OCN-23-0035-1 (Coast Highway Incentive District)**

**October 12, 2023**

**CORRESPONDENCE**

**From:** [Christopher Pederson](#)  
**To:** [Schwing, Karl@Coastal](#); [Leslie, Kanani@Coastal](#); [Ross, Toni@Coastal](#)  
**Cc:** [Warren, Louise@Coastal](#); [Reed, Jessica@Coastal](#)  
**Subject:** Oceanside LCPA (Coast Highway Incentive District) & AB 2097 (parking near transit)  
**Date:** Monday, April 3, 2023 11:02:12 AM

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Hi everyone,

FYI later this week I'll be submitting a comment letter to the Commission raising concerns about the staff recommendation to the extent it may complicate, delay, or thwart Oceanside's efforts to promote infill multi-family housing close to transit and to make Coast Highway safer and more conducive to walking and bicycling. I'm emailing you this morning to give you a heads up about a legal issue regarding parking regulations in the the proposed Incentive District that the staff report doesn't address.

Last year the legislature passed AB 2097, which enacted Government Code section 65863.2. That section strictly limits the circumstances in which any public agency, including the Commission, may require parking to be included in development located within one-half mile of a major public transit stop. The main Oceanside train station and the Coast Highway Sprinter station both qualify as major transit stops, therefore much, if not all, of the proposed Incentive District is subject to the parking limitations specified in Government Code section 65863.2. Those limitations prohibit any minimum parking requirements for residential development with fewer than 20 units or that dedicates at least 20 percent of the units to moderate or lower income households or to students, the elderly, or persons with disabilities. (Gov. Code section 65863.2(c).) A local government may require other categories of development to include parking *only* if certain difficult to achieve criteria are satisfied. (Gov. Code section 65853.2(b).) None of those criteria relate to public access to the coast, which is the sole Coastal Act basis for requiring new development to provide parking.

Government Code section 65853.2 already limits the application the LCP's current parking rules within one-half mile of major transit stops. It would also significantly limit application of the alternative minimum parking requirements proposed in the pending LCP amendment. To avoid confusion and potential misapplication of current or potential future LCP parking requirements, the suggested modifications should be revised to acknowledge this new state law and to clarify how it would play out within the proposed Incentive District.

(Although this new state statute limits the authority of the Commission and local governments to enforce LCP parking requirements in areas located within one-half mile of major transit stops, it is consistent with Coastal Act. Coastal Act section 30252 has always allowed the provision of public transportation to be a substitute for "adequate parking." This new legislation simply provides more specificity about the circumstances in which the Commission and local governments *must* allow the provision of public transit to substitute for parking requirements. As the legislature expressly found in the statute, parking requirements can lead to increased greenhouse gas emissions, so limiting parking requirements in areas where public transit is available also furthers the Commission's and the state's efforts to address climate disruption.)

I've copied below the text of the new Government Code provision and of the relevant statutory cross-references defining "major transit stop." I've bolded particularly relevant statutory language.

Sincerely,

Chris Pederson

Gov. Code 65853.2(a) A public agency shall not impose or enforce any minimum automobile parking requirement on a residential, commercial, or other development project if the project is located within one-half mile of public transit.

(b) Notwithstanding subdivision (a), a city, county, or city and county may impose or enforce minimum automobile parking requirements on a project that is located within one-half mile of public transit if the public agency makes written findings, within 30 days of the receipt of a completed application, that not imposing or enforcing minimum automobile parking requirements on the development would have a substantially negative impact, supported by a preponderance of the evidence in the record, on any of the following:

(1) The city's, county's, or city and county's ability to meet its share of the regional housing need in accordance with Section 65584 for low- and very low income households.

(2) The city's, county's, or city and county's ability to meet any special housing needs for the elderly or persons with disabilities identified in the analysis required pursuant to paragraph (7) of subdivision (a) of Section 65583.

(3) Existing residential or commercial parking within one-half mile of the housing development project.

**(c) For a housing development project, subdivision (b) shall not apply if the housing development project satisfies any of the following:**

(1) The development dedicates a minimum of 20 percent of the total number of housing units to very low, low-, or moderate-income households, students, the elderly, or persons with disabilities.

(2) The development contains fewer than 20 housing units.

(3) The development is subject to parking reductions based on the provisions of any other applicable law.

(d) Notwithstanding subdivision (a), an event center shall provide parking, as required by local ordinance, for employees and other workers.

(e) For purposes of this section:

(1) "Housing development project" means a housing development project as defined in paragraph (2) of subdivision (h) of Section 65589.5.

(2) "Low- and very low income households" means the same as "lower income households" as defined in Section 50079.5 of the Health and Safety Code.

(3) "Moderate-income households" means the same as "persons and families of moderate income," as defined in Section 50093 of the Health and Safety Code.

(4) "Public agency" means the state or any state agency, board, or commission, any city, county, city and county, including charter cities, or special district, or any agency,

board, or commission of the city, county, city and county, special district, joint powers authority, or other political subdivision.

(5) **“Public transit” means a major transit stop as defined in Section 21155 of the Public Resources Code.**

(6) “Project” does not include a project where any portion is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging, except where a portion of a housing development project is designated for use as a residential hotel, as defined in Section 50519 of the Health and Safety Code.

(f) This section shall not reduce, eliminate, or preclude the enforcement of any requirement imposed on a new multifamily residential or nonresidential development that is located within one-half mile of public transit to provide electric vehicle supply equipment installed parking spaces or parking spaces that are accessible to persons with disabilities that would have otherwise applied to the development if this section did not apply.

(g) When a project provides parking voluntarily, a public agency may impose requirements on that voluntary parking to require spaces for car share vehicles, require spaces to be shared with the public, or require parking owners to charge for parking. A public agency may not require that voluntarily provided parking is provided to residents free of charge.

(h) (1) Subdivision (a) shall not apply to commercial parking requirements if it conflicts with an existing contractual agreement of the public agency that was executed before January 1, 2023, provided that all of the required commercial parking is shared with the public. This subdivision shall apply to an existing contractual agreement that is amended after January 1, 2023, provided that the amendments do not increase commercial parking requirements.

(2) A project may voluntarily build additional parking that is not shared with the public.

(i) The Legislature finds and declares that the imposition of **mandatory parking minimums can** increase the cost of housing, limit the number of available units, **lead to** an oversupply of parking spaces, and **increased greenhouse gas emissions. Therefore, this section shall be interpreted in favor of the prohibition of the imposition of mandatory parking minimums as outlined in this section.**

Pub. Resources 21155(b): For purposes of this chapter, a transit priority project shall (1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provide a minimum net density of at least 20 dwelling units per acre; and (3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. **A major transit stop is as defined in Section 21064.3, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan.** For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units,

whichever is less, in the project are farther than one-half mile from the stop or corridor.

Pub. Resources 21064.3: “Major transit stop” means a site containing any of the following:

- (a) **An existing rail or bus rapid transit station.**
- (b) A ferry terminal served by either a bus or rail transit service.
- (c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

**From:** [Christopher Pederson](#)  
**To:** [Ross\\_Toni@Coastal](mailto:Ross_Toni@Coastal)  
**Subject:** Re: Oceanside LCPA (Coast Highway Incentive District) & AB 2097 (parking near transit)  
**Date:** Thursday, April 6, 2023 10:01:53 AM

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Thanks, Toni. Robin had let me know about the withdrawal, which is disappointing news. I hope you and the City can reach an agreement on the visitor-serving issues so that the resubmittal can go smoothly and quickly. I think I'll hold off on submitting formal written comments until I see the City's response. Can you forward it to me when you receive it?

That said, here are the basic points I was planning to make:

There should be an additional suggested mod to add an LUP policy implementing Coastal Act sections 30252 and 30253(d). (I reviewed what I think/hope is the current version of the City's LUP and couldn't find such a policy, but I wasn't confident I was reviewing a truly up-to-date version.)

I'd modify Suggested Mod. No. 1 to clarify that additional transportation analysis isn't required for roadway modifications that were evaluated in the EIR for the Coast Highway Corridor Study. I would also add language to clarify that other roadway modifications to coastal access routes can result in additional private vehicle delay if they enhance ped, bike, and transit access.

I would eliminate Suggested Mod. No. 2. I don't think piecemeal evaluation of potential traffic congestion impacts of non-roadway development projects is the way to go. The mitigation measures such studies typically recommend are often counterproductive from perspective of minimizing VMT and car trips and enhancing bike/ped/transit service.

I think it'd also be good to work with the city on a suggested mod to clarify how last year's AB 2011 and AB 2097 will affect implementation of the plan.

Finally, I hope the Commission will be flexible in discussions with the City about how to address concerns re visitor-serving accommodations. Of course they're a priority concern in the Coastal Act, but the current low density car-oriented retail development patterns on most of that stretch of Coast Highway are very bad from a Coastal Act and climate perspective given the presence of two nearby train stations and service by multiple bus routes.

And thanks again for taking the time to talk with me yesterday and for your thoughtful responses.

Chris

On Apr 6, 2023, at 8:55 AM, Ross, Toni@Coastal <[Toni.Ross@coastal.ca.gov](mailto:Toni.Ross@coastal.ca.gov)> wrote:

Good Morning Chris,

I wanted firstly to thank you for your thoughtful comments regarding the City of Oceanside's Coast Highway Incentive District LCPA. Unfortunately, the City withdrew

the amendment yesterday afternoon, citing concerns with the recommended modifications addressing lower-cost overnight accommodations. While this is disappointing news, the City did indicate they will be providing formal comments and will be re-submitting the LCPA at a later date. Given this, the LCP Amendment will not be heard at the April hearing, and any comments you are working on will not be posted on the Commission's website. If you'd still like to submit comments, I will be sure to include them when the amendment is brought to the Commission, or you may wait to see how the recommendation evolves as Commission staff continue to work with the City before submitting formal comments.

Thank you,  
Toni

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**From:** Christopher Pederson <[cpedersonlaw@gmail.com](mailto:cpedersonlaw@gmail.com)>  
**Sent:** Monday, April 3, 2023 11:02 AM  
**To:** Schwing, Karl@Coastal <[Karl.Schwing@coastal.ca.gov](mailto:Karl.Schwing@coastal.ca.gov)>; Leslie, Kanani@Coastal <[Kanani.Leslie@coastal.ca.gov](mailto:Kanani.Leslie@coastal.ca.gov)>; Ross, Toni@Coastal <[Toni.Ross@coastal.ca.gov](mailto:Toni.Ross@coastal.ca.gov)>  
**Cc:** Warren, Louise@Coastal <[Louise.Warren@coastal.ca.gov](mailto:Louise.Warren@coastal.ca.gov)>; Reed, Jessica@Coastal <[Jessica.Reed@coastal.ca.gov](mailto:Jessica.Reed@coastal.ca.gov)>  
**Subject:** Oceanside LCPA (Coast Highway Incentive District) & AB 2097 (parking near transit)

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## Ross, Toni@Coastal

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**From:** Ross, Toni@Coastal  
**Sent:** Wednesday, September 27, 2023 12:53 PM  
**To:** Ross, Toni@Coastal  
**Subject:** FW: LCP-6-OCN-21-0077-2 (Coast Highway Incentive District)

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**From:** Russ Cunningham <RCunningham@oceansideca.org>  
**Sent:** Wednesday, April 5, 2023 5:08 PM  
**To:** Ross, Toni@Coastal <Toni.Ross@coastal.ca.gov>  
**Cc:** Darlene Nicandro <DNicandro@oceansideca.org>; Sergio Madera <SMadera@oceansideca.org>  
**Subject:** LCP-6-OCN-21-0077-2 (Coast Highway Incentive District)

Toni,

In light of our inability to come to terms on Coastal staff's suggested modifications regarding lower-cost visitor-serving accommodations( LCVSAs), we hereby formally withdraw our application for the Coast Highway Incentive District LCPA and request that this item be pulled from the Commission's April meeting agenda.

The Incentive District and complete streets improvements have been 15 years in the making and were established through a robust public outreach process. The proposed LCPA aims to revitalize the Coast Highway corridor, increase public access, expand local housing opportunities, and further the City's efforts towards GHG emission reduction targets. Although we acknowledge and appreciate progress made in our continued discussions, there is no clear nexus between the provisions of the Incentive District and Coastal staff's suggested modifications regarding LCVSAs . In addition, we strongly believe that these suggested modifications not only defy Section 30213 of the Coastal Act, but also have the potential to create a significant "chilling effect" on future coastal developments, including budget/economy hotels and motels that inherently function as LCVSAs.

Given the City's enormous investment in this project, we want to exhaust every possibility for compromise and consensus with Coastal staff. Therefore, within the next 30 days, City staff will deliver a written response to the staff report for this item. We hope this response will contribute to ongoing dialogue with Coastal staff on the issues that threaten to undo this critical project, and, in turn, significantly complicate other long-range planning efforts (e.g., General Plan Update, Local Coastal Program Update).

Please confirm your receipt of this withdrawal request at your earliest convenience and do not hesitate to contact me if you have any questions.

Regards,  
Russ

Russ Cunningham, AICP  
Principal Planner  
City of Oceanside  
Development Services Department  
Planning Division  
760.435.3525  
[rcunningham@ci.oceanside.ca.us](mailto:rcunningham@ci.oceanside.ca.us)

September 20, 2023

Dear Coastal Commission Members,

On behalf of the Oceanside Chamber of Commerce, I am pleased to submit this letter of support for the City of Oceanside's Coast Highway Incentive District certification. This much anticipated project is of great value and importance to our community from the perspective of economic development and quality of life.

One of the key elements of the plan, the introduction of housing into the corridor, will be a tremendous benefit to our small business community, as it will provide a much-needed expansion of their customer base along with housing for their workforce.

In keeping with the California Coastal Act and the City's Local Coastal Program, the District will provide for a wide range of visitor-serving uses and will streamline the development review process for visitor accommodations.

One of the most critical issues for the future growth of Oceanside's business community is the supply of workforce housing. The Incentive District addresses regional housing needs by allowing for increased residential densities and standalone residential. Objective design standards will bring more certainty to the development review process while ensuring high-quality, pedestrian-oriented development.

The District is informing the development of the Smart and Sustainable Corridors Specific Plan, a component of the City's General Plan Update that will promote smart growth, active transportation, and transit access within the City's major inland commercial corridors including Mission Avenue, Oceanside Blvd, and Vista Way/Plaza Drive.

The Incentive District will include improved pedestrian access to the coast by making it safer and easier to cross Coast Highway, also enhancing access to businesses on both sides of Coast Highway.

Further benefits of the District include expanded tree canopy and enhanced wayfinding that will improve coastal access for motorists, pedestrians, and bike riders.

For these reasons and more, we respectfully request your support of Oceanside's Incentive District Certification. Thank you for your consideration.

Sincerely,



Scott M. Ashton, CEO  
Oceanside Chamber of Commerce



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- San Diego County
- Water Authority
- Southern California
- Tribal Chairmen's Association
- Mexico

September 20, 2023

Karl Schwing  
California Coastal Commission  
San Diego Coast District  
7575 Metropolitan Drive #103  
San Diego, CA 92108

Dear Mr. Karl Schwing,

RE: Coast Highway Incentive District — SANDAG Letter of Consistency

The San Diego Association of Governments (SANDAG) is the Metropolitan Planning Organization for the San Diego region. In December 2021, the SANDAG Board adopted the 2021 Regional Plan, which includes our region's Sustainable Communities Strategy (SCS) as required by Senate Bill 375 (Steinberg, 2008). A core component of the SCS is compact mixed-use development supported by transit and active transportation within a network of regional Mobility Hubs where most of the housing and job growth is focused over the next 30 years.

The City of Oceanside's Coast Highway Incentive District implements the SCS vision by incentivizing multi-family housing in the Oceanside Mobility Hub and wholly within a 2035 Transit Priority Area. The project will provide needed infill housing that will reduce vehicle miles travelled and greenhouse gas emissions. The Coast Highway Incentive District is in alignment with our SCS and SANDAG supports consideration of the proposed Coast Highway Incentive District for approval.

If you have any questions regarding this letter, please feel free to contact Tuere Fa'aola, Sustainable Communities Program Manager, at (619) 699-1989 or at [tuere.faaola@sandag.org](mailto:tuere.faaola@sandag.org).

Sincerely,

  
[Antoinette Meier \(Sep 20, 2023 16:35 PDT\)](#)

**Antoinette Meier**  
Senior Director, Regional Planning

**From:** [Christopher Pederson](#)  
**To:** [SanDiegoCoast@Coastal](#)  
**Cc:** [Huckelbridge, Kate@Coastal](#); [Schwing, Karl@Coastal](#); [Leslie, Kanani@Coastal](#); [Ross, Toni@Coastal](#); [Mayer, Robin@Coastal](#)  
**Subject:** Public Comment on October 2023 Agenda Item Thursday 18a - City of Oceanside LCP Amendment No. LCP-6-OCN-23-0035-1 (Coast Highway Incentive District).  
**Date:** Friday, October 6, 2023 12:05:22 PM

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Dear Chair Brownsey and Commissioners:

Oceanside's proposed LCP amendment for the Coast Highway Incentive District is the kind of LCP amendment that the Commission should be encouraging and facilitating statewide. It aims to promote multifamily development in areas close to major transit stations in conjunction with efforts to transform an automobile-oriented highway into a thoroughfare that's more conducive to walking, biking, and riding transit. Some of staff's proposed suggested modifications, however, have the potential to undermine these important benefits. The Commission should revise the suggested modifications as discussed in more detail below.

As an initial matter, I am glad that Commission staff and the city have apparently reached an understanding about how to address lower-cost lodging, but the process took far too long. Oceanside adopted the strategic plan that resulted in this LCP amendment in 2009. This LCP amendment was originally filed as complete with the Commission more than three years and was withdrawn and resubmitted twice in order to allow more time to work out issues. If the Commission is to have any hope of promoting more multifamily housing and reducing automobile dependency at the pace that the housing and climate crises require, the Commission should prioritize taking action on LCP amendments such as this much more expeditiously.

The staff report addresses transportation-related issues primarily through the lens of how the LCP amendment might slow down automobile traffic. Oceanside, however, has an unusually rich concentration of passenger rail service that should be promoted as a transportation resource both for residents and visitors. From the Oceanside Transit Center located next to the northern end of the proposed Incentive District, 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 rail routes also provide direct service from Oceanside to Orange County, Los Angeles, and the Inland Empire cities of Riverside and San Bernardino seven days a week. The Coaster commuter rail service connects Oceanside to San Diego and the beach communities in between. The Sprinter rail line connects Oceanside to inland communities such as Vista, San Marcos, and Escondido. Multiple NCTD Breeze bus routes connect the Transit Center to neighborhoods throughout northern San Diego County. The Coast Highway Sprinter station and nearby bus stops are located in the southern portion of the Incentive District.

In other words, people who will live in the Incentive District will be able to easily take transit to large portions of southern California. And people from large portions of southern California, including inland areas, can easily take transit to visit Oceanside's shoreline.

The proposed Incentive District is precisely the kind of area where the Commission should encourage abundant multifamily housing and moving away from an automobile-focused, automobile-dependent transportation network. 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).) Complying with these Coastal Act also helps to reduce the greenhouse gas emissions that fuel climate change and that thereby imperil a whole host of coastal resources.

By using automobile-based levels of service (LOS) as the trigger for additional potentially time-consuming study and for mitigation measures, the staff recommendation has the potential to undermine the effectiveness of the proposed Incentive District. Although the Commission has frequently assumed that the delays drivers may experience are tantamount to a denial of access, the staff report does not provide any evidence to substantiate that concern. That assumption is especially questionable in the neighborhoods such as the Incentive District, which is served by numerous transit lines, including direct rail service from multiple inland areas.

The Commission should revise recommended suggested modifications in the following respects:

**1) Revise Suggested Modification No. 2, section C.9.c to read:**

“When required, the Plan shall provide a list of specific traffic mitigation measures to be provided. Mitigation measures shall include measures to address automobile traffic, as well as enhancement of pedestrian, bicycle, and public transit operations. Automobile traffic mitigation measures shall minimize vehicle miles traveled and shall not reduce the amount of proposed housing or impede or degrade pedestrian or bicycle access or public transit operations.” (Proposed revision underlined.)

**Rationale:** Automobile traffic mitigation commonly focuses on measures intended to reduce density or vehicle delay and increase vehicle capacity. Reductions in residential density, although they may reduce local traffic congestion, will tend to increase overall vehicle miles traveled, especially when the reduced density occurs in a walkable, bikeable area with transit service. Also, prioritizing vehicle speed and throughput often makes conditions more dangerous and less convenient for pedestrians, bicyclists, and transit operators. That can also promote additional vehicle traffic. All of those common effects of automobile traffic mitigation conflict with Coastal Act requirements to concentrate development, promote public transit and modes of transportation other than the automobile and to minimize vehicle miles traveled. (See Pub. Resources Code, §§ 30250, 30252, 30253(d).) The Commission should revise this suggested modification to bring it into compliance with these Coastal Act requirements.

**2) Delete Suggested Modification No. 5 or revise to allow multifamily residential uses if sufficient space is reserved for coastal dependent, recreation, or visitor-serving commercial uses.**

**Rationale:** The Incentive District is especially well-suited for multifamily residential development given its proximity to two rail stations and service by multiple bus lines. A complete prohibition on mixed-use multifamily housing in visitor-serving zones goes beyond what is necessary to ensure protection for priority coastal-dependent and visitor-servings uses and conflicts with the Coastal Act mandate to concentrate development in urbanized areas. The Commission should either delete Suggested Modification No. 5 in its entirety or revise it to allow mixed-use multifamily residential uses, for example on the upper stories of buildings, so long as adequate space is reserved for coastal-dependent or visitor-serving uses.

**3) Revise Suggested Modification No. 16 to add a new footnote to Table 4 of Section 911:**

“6) For sites located within one-half mile of a major transit stop, parking may be required only to the extent consistent with Government Code, § 65863.2.”

**Rationale:** AB 2097, enacted in 2022, imposes strict limits on the authority of state agencies and local governments to impose or enforce minimum parking requirements. Given that a significant portion of the Incentive District is located within one-half mile of either the Oceanside Transit Center or the Coast Highway Sprinter station, the provision of the LCP amendment establishing parking requirements should be revised to acknowledge this state law limitation. Failing to do so could lead to confusion about the applicability of parking requirements.

Thank you for your consideration of my comments.

Sincerely,

Christopher Pederson



October 3, 2023

Dear California Coastal Commission,

On behalf of Visit Oceanside, we respectfully express our support for Oceanside's Coast Highway Incentive District. The Coast Highway Vision Plan supports important infrastructure, environmental impacts, housing, and connectivity/mobility for this key corridor through our city. These elements are an important part of Visit Oceanside's Sustainable Tourism Master Plan (STMP) as well as the city's General Plan update. The STMP is our ten-year roadmap to creating resiliency for our industry while balancing the needs of our community.

Please consider the following important factors as they're critical in providing the opportunity for Oceanside to improve the quality of life for everyone, as well as quality of environment, economic impact, and experience.

- The Incentive District (ID) addresses regional housing needs by allowing for increased residential densities and standalone residential. Objective design standards will bring more certainty to the development review process while ensuring high-quality, pedestrian-oriented development.
- The introduction of housing into the corridor will stabilize the commercial sector and enhance the viability of visitor-serving uses in the City's coastal zone.
- In keeping with the California Coastal Act and the City's Local Coastal Program, the ID will provide for a wide range of visitor-serving uses. The ID will also streamline the development review process for visitor accommodations.
- The associated "complete streets" improvements will facilitate active transportation, while reducing vehicle emissions from idling and acceleration. These improvements will enhance pedestrian access to the coast by making it safer and easier to cross Coast Highway.
- Expanded tree canopy will enhance carbon sequestration, support stormwater management, reduce the heat island effect, and promote walkability.
- Enhanced wayfinding will improve coastal access for motorists, pedestrians, and bike riders.
- The ID is informing the development of the Smart and Sustainable Corridors Specific Plan, a component of the City's General Plan Update that will promote smart growth, active transportation, and transit access within the City's major inland commercial corridors (Mission Avenue, Oceanside Blvd, and Vista Way/Plaza Drive).

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Leslee Gaul".

Leslee Gaul  
President/CEO  
Visit Oceanside

## Ross, Toni@Coastal

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**From:** ExecutiveStaff@Coastal  
**Sent:** Friday, October 6, 2023 4:13 PM  
**To:** Leslie, Kanani@Coastal; Ross, Toni@Coastal  
**Subject:** FW: Public Comment on October 2023 Agenda Item item 18 and 20d - for the City of Oceanside

Fyi

-----Original Message-----

From: Colleen Balch <mschief14@gmail.com>  
Sent: Friday, October 6, 2023 1:52 PM  
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>  
Subject: Re: Public Comment on October 2023 Agenda Item item 18 and 20d - for the City of Oceanside

Sorry for any confusion this is my first time writing to the commission. I for the most part support your comments to the City. My issues are that there are too many inconsistencies in the information given to you by the City. One example is stating that the incentive districts go as far south as Cassidy. That is not true. Both the Coast highway lane reduction and developers incentive end at Morse St. The City stated that the developer incentives ends at Cassidy. Not true. There are a few others that I will be meeting with the City Manager about but for now I would encourage you to postpone the vote on these items. Thank you,

Colleen Balch  
Resident of Oceanside  
Former Planning Commissioner  
Sent from my iPhone

> On Oct 6, 2023, at 10:52 AM, Colleen Balch <mschief14@gmail.com> wrote:

>

> I would like to say that I fully support your responses to these two items on the agenda. Thank you for all your hard work on these items.

>

> Respectfully,

>

> Colleen Balch

> Resident of City of Oceanside.



# CITY OF OCEANSIDE

DEVELOPMENT SERVICES DEPARTMENT / PLANNING DIVISION

October 5, 2023

Toni Ross  
California Coastal Commission  
7575 Metropolitan Drive, Suite 103  
San Diego, CA 97724

RE: CCC staff suggested modifications to LCP-6-OCN-21-0077-2 (Coast Highway Incentive District)

Ms. Ross:

As a follow-up to the October 3, 2023 discussion between CCC and City of Oceanside staff on suggested modifications related to low-cost visitor-serving accommodations (LCVSAs), the City proposes an additional revision, as depicted below.

### **Suggested Modification**

*New hotel and motel development within the City shall provide a range of rooms and room prices in order to serve all income ranges. Priority shall be given to developments that include public recreational opportunities.*

### **City-Proposed Revision**

*New hotel and motel development within ~~the City~~ the Coastal Zone shall ~~should~~ collectively provide a range of rooms ~~and room prices~~ in order to serve ~~all~~ a wide variety of income ranges. Priority shall be given to developments that include public recreational opportunities.*

The proposed revision ensures that the policy applies only within the City's Coastal Zone, clarifies that the policy refers to the totality of new and existing lodging uses and not individual projects, and removes the term "room prices" to preclude the notion that the policy is intended to set rates for new lodging uses.

We ask that CCC staff incorporate this revision into its suggested modifications for the Coast Highway Incentive District, by whatever means appropriate at this juncture.

The City appreciates CCC staff's willingness to engage in ongoing dialogue and work toward consensus on this important project.

Should you have any questions, please contact me at [rcunningham@oceansideca.org](mailto:rcunningham@oceansideca.org) or (760) 435-3525.

Sincerely,

Russ Cunningham, AICP  
Principal Planner  
Development Services Department

October 6, 2023

TO: California Coastal Commission

RE: October 2023 City of Oceanside LCP Amendment No. LCP-6-OCN-23-0035-1 (Coast Highway Incentive District). – Support WITH corrections

**Concerns with maps submitted by the City of Oceanside and Complete Streets Reference**

Honorable Commissioners:

I'm writing to express my concern about three items submitted by the City of Oceanside as Exhibits that are incorrect and have not been amended by the City of Oceanside, even after pointing out the errors.

First, Exhibit 2: Project Area and Vicinity. The Staff Report correctly identifies the project Area and Vicinity beginning two streets from the pier to Morse St. (South Oceanside); however, in Exhibit 2 (attachment 1), the City has identified the project area to begin two streets south of the pier to the terminus of southern Oceanside. City Council direction was to leave South Oceanside out of the Incentive District and I am concerned that having a map that incorrectly shows different than council direction, might become problematic with future development.

Next, I have brought to our planner's attention mis-labeling of properties on the city's Zoning Map.

We have two pieces of parkland, listed as public parkland in our Parks and Recreation Master Plan. One is Buccaneer Beach Park and the other approximately three acres large adjacent to the north side of the Loma Alta Creek.

I did send another email to our planner requesting the Zoning be changed to reflect the parkland designation, but have not heard back from the planner to date. (ATTACHMENT 2)

Finally, I found reference to Complete Streets in the Staff Report (ATTACHMENT 3). It states, "...After implementation of the complete streets project, Coast Highway would be converted to two lanes (one vehicle lane in each direction, between

Seagaze Drive and Cassidy Sreet,...” as per council policy, South Oceanside is to remain a four lane Hwy beginning at Morse St. to Vista Way.

Thank you,

Shari Mackin

Oceanside Resident

cc: files

ATTACHMENT 1:



Model by iStockphoto

City of Gloucester Coast Highway Corridor Study, 10017

Figure 3-2  
Project Area and Vicinity

EXHIBIT NO. 2
<b>PROJECT AREA AND VICINITY</b>
007400427-00173
Gloucester Coastal Commission

# ATTACHMENT 2

Zoning Inbox x



**Shari Mackin** <bzshari@gmail.com>

to Russ, Colleen, Richard, Joel, me

Thu, Oct 5, 1:08 PM (23 hours ago) ☆

Hi Russ,

I'm curious about the labeling of these properties.

Can you tell me why Buc isn't labeled as "parkland" rather Open Space - O (Coastal)?

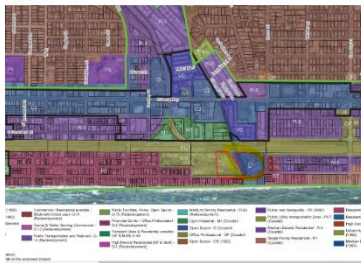
Also, the red circled area to the north of Buc where the Transfer Station will be placed is parkland. Is that why the green PUT area has this zoning: Public Facilities, Parks, Open Space - D-15 (Redevelopment)?

A little confusing that Buc is labeled Open Space whereas the parkland across the creek (I am assuming) is noted as parkland.

Will you please clarify?

Thanks!

Shari



## ATTACHMENT 3

Additionally, while not included in the subject amendment request but relevant to this consideration, the City is also in the process of planning for the associated Complete Streets project, which would modify the Coast Highway corridor and roadway, including lane conversions, street improvements, intersection roundabouts, and increased parking and bicycle facilities. The 3.5-mile stretch currently operates as a four-lane corridor, including two vehicle lanes in each direction with limited parking, and no designated bicycle facilities. After implementation of the complete streets project, Coast Highway would be converted to two lanes (one vehicle lane in each direction), between Seagaze Drive and Cassidy Street, including a continuous Class II striped bicycle lane, ten (10) mid-block crosswalks, twelve (12) roundabouts in place of traffic signals, and streetscape enhancements ([ref. Exhibit No. 3](#)). The City memorialized these roadway changes through revisions to the City's Circulation Element, which is not a part of its certified LCP.



**From:** [SanDiegoCoast@Coastal](mailto:SanDiegoCoast@Coastal)  
**To:** [Ross, Toni@Coastal](mailto:Ross_Toni@Coastal)  
**Subject:** FW: Public Comment on October 2023 Agenda Item Thursday 18a - City of Oceanside LCP Amendment No. LCP-6-OCN-23-0035-1 (Coast Highway Incentive District).  
**Date:** Friday, October 6, 2023 1:02:08 PM

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**From:** Suneson, Yael <yael.suneson@woodpartners.com>  
**Sent:** Friday, October 6, 2023 12:59 PM  
**To:** SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>  
**Cc:** Wilk, Julia <julia.wilk@woodpartners.com>  
**Subject:** Public Comment on October 2023 Agenda Item Thursday 18a - City of Oceanside LCP Amendment No. LCP-6-OCN-23-0035-1 (Coast Highway Incentive District).

Re: October 12, 2023, Agenda Item 18 - City of Oceanside LCP Amendment No. LCP-6-OCN-23-0035-1 (Coast Highway Incentive District)

Dear Coastal Commission Members,

On behalf of Wood Partners, I thank you for the opportunity to share our support for the City of Oceanside's Coast Highway Incentive District certification.

Wood Partners is a multifamily development firm that currently has a mixed-use project in Oceanside under construction set to deliver in 2024. The project is one of the first projects to bring affordable housing to Oceanside. It is a density bonus project with 309 multifamily units for rent, including 26 very low income units, and 5,400 SF of retail. Despite the highly desirable location with access to the ocean and downtown Oceanside and with favorable zoning within the City's LCP, it was very challenging to finance the project due to the long lead time, risk, and considerable costs to start construction. There were many times when the project was on the verge of not going forward. This was a direct result of the exposure we took on due to CEQA requirements and issues that accompanied the EIR process. With the distress in today's financial markets, it would be even harder to raise capital to build that project today.

As we are all aware, California has a huge housing deficit to the tune of 3-4 million units, which has led to lack of affordability in the existing stock as there is not enough housing to support the demand. This affordability issue impacts all income levels in California, not only the low income earners. Because of this we have seen a flight to more affordable areas, either suburban areas or a flight from California.

One of the most critical issues for the future growth of Oceanside is the supply of workforce housing. The Incentive District addresses regional housing needs by allowing for increased residential densities and standalone residential. Objective design standards will bring more certainty to the development review process while ensuring high-quality, pedestrian-oriented development, and a more easily accessible coastline.

The Incentive District is informing the development of the Smart and Sustainable Corridors Specific

Plan, a component of the City's General Plan Update that will promote smart growth, active transportation, and transit access. It will also improve pedestrian access to the coast by making it safer and easier to cross Coast Highway, also enhancing access to businesses on both sides of Coast Highway. Further benefits of the Incentive District include expanded tree canopy and enhanced wayfinding that will improve coastal access for motorists, pedestrians, and bike riders. All of the positive impacts increase the desirability of the area and supports financing efforts for housing development. In light of this, we support concentrated development density, specifically density near transit with a streamlined entitlement approach.

Your approval of the Oceanside Coast Highway Incentive District would support the ability to bring more housing to Oceanside that is aligned with the Incentive District's programmatic EIR. The ability to develop concentrated density would increase affordability overall, as each project would require less cost, less time, and less risk allowing more housing units to be built.

For these reasons and more, we respectfully request your support of Oceanside's Incentive District Certification.

Thank you for your consideration.

Thanks,  
Yael Suneson

**Yael Victoria Suneson** | Vice President, Development | Wood Partners  
8929 S Sepulveda Blvd. Suite 308 | Los Angeles, CA 90045  
O: 949.260.9960 | C: 917.664.6117 | [yael.suneson@woodpartners.com](mailto:yael.suneson@woodpartners.com)  
[woodpartners.com](http://woodpartners.com)

*Improving People's Lives by Creating Better Communities*