

**APPENDIX A**  
**NOP COMMENTS**

## NOTICE OF PREPERATION COMMENTS RECEIVED

#	Comment Letter / Public Speaker	Summary of Issues	EIR Section Addressed In
1	Mary Weiss (Email Dated: 12/28/2018)	<ul style="list-style-type: none"> <li>• Impact of additional traffic on streets</li> <li>• Speed limit signs</li> <li>• Street lighting</li> <li>• Additional stop signs along Descanso or at the corner of old River and Descanso</li> <li>• Speed barriers</li> <li>• Emergency Evacuation</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.12 <i>Land Use</i> and Section 4.18 <i>Transportation</i></li> <li>• Section 3.0 <i>Project Description</i></li> <li>• Section 4.18 <i>Transportation</i></li> <li>• Section 4.18 <i>Transportation</i></li> </ul>
2	San Diego County Archaeological Society, Inc. (Letter Dated: 11/29/18)	<ul style="list-style-type: none"> <li>• Request copy of cultural resources technical report and EIR for review, when available.</li> </ul>	<ul style="list-style-type: none"> <li>• City of Oceanside to provide directly to requestor</li> </ul>
3	Rincon Band of Luiseno Indians, Destiny Colocho (Email Dated: 12/26/18)	<ul style="list-style-type: none"> <li>• Request initiation for tribal consultation in compliance with AB 54</li> <li>• Request archaeological record search and assessment, when available</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.19 <i>Tribal Cultural Resources</i></li> <li>• City of Oceanside to provide directly to requestor</li> </ul>
4	San Luis Rey Band of Mission Indians, Merri Lopez-Keifer (Letter Dated: 1/7/19)	<ul style="list-style-type: none"> <li>• Request initiation for tribal consultation in compliance with AB 54</li> <li>• Native American Monitor during all ground disturbing activities</li> <li>• Native American Monitor during tribal cultural resource assessment surveys</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.19 <i>Tribal Cultural Resources</i></li> <li>• Section 4.6 <i>Cultural Resources</i> and Section 4.19 <i>Tribal Cultural Resources</i></li> </ul>
5	Native American Heritage Commission (Letter Dated: 12/3/18)	<ul style="list-style-type: none"> <li>• Recommendation for consultation with California Native tribes that are traditionally and culturally affiliated with the geographic area in compliance with AB 52 and SB 18</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.19 <i>Tribal Cultural Resources</i></li> </ul>
6	California Department of Transportation (Letter Dated: 11/30/18)	<ul style="list-style-type: none"> <li>• Prepare a traffic impact study and coordinate with Caltrans</li> <li>• Address Complete Streets and Climate Change policies</li> <li>• Coordinate with Caltrans to implement necessary improvements at intersections and interchanges</li> <li>• Include mitigation measures to state facilities in traffic impact study, if required.</li> <li>• Any work within Caltrans ROW requires approval from Caltrans and an encroachment permit.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.18 <i>Transportation</i></li> <li>• Section 4.9 <i>Greenhouse Gas Emissions</i></li> <li>• This comment is noted.</li> <li>• Section 4.18 <i>Transportation</i></li> <li>• No work within the Caltrans ROW required</li> </ul>
7	Wittwer Parkin LLP (Letter Dated: 1/4/19)	<ul style="list-style-type: none"> <li>• Identify if Section 401, 404, NPDES, ESA or Streambed Alteration Agreements are required.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.5 <i>Biological Resources</i></li> </ul>

#	Comment Letter / Public Speaker	Summary of Issues	EIR Section Addressed In
		<ul style="list-style-type: none"> <li>Analyze any impacts to San Luis Rey River.</li> <li>Avoid piecemealing project in EIR analysis.</li> <li>Discuss all topics of environmental impacts required by CEQA</li> <li>Evaluate agricultural lands per FMMP guidelines and Williamson Act contract impacts.</li> <li>Disclose baseline air quality conditions and project impacts on baseline, including cumulative air quality impacts.</li> <li>Disclose baseline greenhouse gas emission conditions and project impacts on baseline, including cumulative GHG impacts.</li> <li>Describe status of City Climate Action Plan and if City is on track to meet targets.</li> <li>Include feasible mitigation measures for any Air Quality or Greenhouse Gas impacts.</li> <li>Evaluate potential hazardous materials impacts to workers or river.</li> <li>Evaluate if demolition of structures will result in asbestos or lead-based paint exposure.</li> <li>Evaluate hazardous impacts to Nichols Elementary School.</li> <li>Evaluate any direct or indirect impacts to San Luis Rey River.</li> <li>Evaluate any flooding hazards related to adjacent San Luis Rey River.</li> <li>Provide all project notices for review.</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.11 <i>Hydrology and Water Quality</i></li> <li>Section 4.0-7.0 of the EIR</li> <li>Section 4.3 <i>Agriculture and Forestry Resources</i></li> <li>Section 4.4 <i>Air Quality</i> and Section 5.0 <i>Cumulative Impacts</i></li> <li>Section 4.9 <i>Greenhouse Gas Emissions</i> and Section 5.0 <i>Cumulative Impacts</i></li> <li>Section 4.9 <i>Greenhouse Gas Emissions</i></li> <li>Section 4.4 <i>Air Quality</i> and Section 4.9 <i>Greenhouse Gas Emissions</i></li> <li>Section 4.10 <i>Hazards and Hazardous Materials</i></li> <li>Section 4.4 <i>Air Quality</i> and Section 4.10 <i>Hazards and Hazardous Materials</i></li> <li>Section 4.10 <i>Hazards and Hazardous Materials</i></li> <li>Section 4.11 <i>Hydrology and Water Quality</i></li> <li>Section 4.11 <i>Hydrology and Water Quality</i></li> </ul>
8	Lawrence Burnett (Written Comment: 12/4/18)	<ul style="list-style-type: none"> <li>Evaluate emergency evacuation in relation to wildlife and additional ingress and egress options</li> <li>Evaluate impacts to privacy of properties on Trinity Street.</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.21 <i>Wildfire</i> and Section 4.18 <i>Transportation</i></li> <li>Privacy measures would be determined at the time of Project Site development based on the residential building type</li> </ul>
9	Anonymous NOP Commenter (Written Comment: 12/4/18)	<ul style="list-style-type: none"> <li>Evaluate if any chances to flood protection is required</li> <li>Disclose if any low income housing will be provided</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.11 <i>Hydrology and Water Quality</i></li> </ul>
10	John and Maria Cofey (Written Comment: 12/4/18)	<ul style="list-style-type: none"> <li>Address any potential security issues</li> <li>Evaluate any privacy issues related to homes near the property line and 2-3 story proposed development</li> <li>Analyze emergency egress/ingress</li> <li>Evaluate any soil chemical impacts from past agricultural use</li> <li>Identify how the project will provide sufficient parking,</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.16 <i>Public Services</i></li> <li>Privacy measures to be determined at the time of Project Site development based on the residential building type</li> <li>Section 4.18 <i>Transportation</i></li> <li>Section 4.10 <i>Hazards and Hazardous Materials</i></li> <li>To be provided on future Site Development Plans</li> </ul>

#	Comment Letter / Public Speaker	Summary of Issues	EIR Section Addressed In
		<p>particularly guest parking</p> <ul style="list-style-type: none"> <li>• Evaluate traffic issues related to Avenida Descanso to Old River Road</li> <li>• Determine if the project will result in any health issues</li> <li>• Evaluate Air Quality and GHG impacts, noise impacts, biological resources, flood issues, utilities and energy</li> <li>• Disclose if affordable housing will be provided or an issue.</li> <li>• Provide notices for review</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.18 <i>Transportation</i></li> <li>• Section 4.10 <i>Hazards and Hazardous Materials</i> and Section 4.4 <i>Air Quality</i></li> <li>• Section 4.4 <i>Air Quality</i>, Section 4.9 <i>Greenhouse Gas Emissions</i>, Section 4.14 <i>Noise</i>, Section 4.5 <i>Biological Resources</i>, Section 4.11 <i>Hydrology and Water Quality</i>, Section 4.20 <i>Utilities and Service Systems</i>, Section 4.7 <i>Energy</i></li> </ul>
11	Public Speaker Comments during NOP Scoping Meeting	<ul style="list-style-type: none"> <li>• Evaluate Soils contamination and potential for hazardous materials dumped at the site.</li> <li>• Describe if future developer can change proposed standards.</li> <li>• Determine if project will exacerbate traffic shortcutting through Rancho Pacifica Community via Avenida Descanso and Old River Street</li> <li>• Evaluate an alternative maintaining site as light industrial and describe need for land use change</li> <li>• Evaluate any privacy issues related to homes near the property line and 2-3 story proposed development</li> <li>• Evaluate potential safety issues</li> <li>• Disclose if affordable housing will be provided or a safety issue.</li> <li>• Provide information on and increased landscaping along project boundary</li> <li>• Project will diminish home values</li> <li>• Evaluate speed on North River Road and safety issues</li> <li>• Public input will not be evaluated or incorporated</li> <li>• Describe project effects on existing SDG&amp;E ROW</li> <li>• Describe future allowable land uses</li> <li>• Analyze noise impacts from North River Road</li> <li>• Identify how the project will provide sufficient parking, particularly guest parking</li> <li>• Disclose maximum number of units allowed to be built</li> <li>• Analyze emergency egress/ingress</li> <li>• Evaluate if construction dust will affect sensitive receptors, such as adjacent neighbors</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.10 <i>Hazards and Hazardous Materials</i></li> <li>• Section 4.18 <i>Transportation</i></li> <li>• Section 7.0 <i>Alternatives</i></li> <li>• Privacy measures would be determined at the time of Project Site development based on the residential building type</li> <li>• Section 4.10 <i>Hazards and Hazardous Materials</i></li> <li>• Section 3.0 <i>Project Description</i>. Landscaping to be designed on future Project Site development plans</li> <li>• Section 4.18 <i>Transportation</i></li> <li>• Section 4.7 <i>Energy</i> and Section 4.20 <i>Utilities and Service Systems</i></li> <li>• Section 3.0 <i>Project Description</i></li> <li>• Section 4.14 <i>Noise</i></li> <li>• Section 3.0 <i>Project Description</i></li> <li>• Section 4.18 <i>Transportation</i></li> <li>• Section 4.4 <i>Air Quality</i></li> </ul>

#	Comment Letter / Public Speaker	Summary of Issues	EIR Section Addressed In
		<ul style="list-style-type: none"> <li>• Evaluate safety issues related to townhomes vs. apartments, in relation to renters vs. owners</li> <li>• Identify street names on all EIR figures</li> <li>• Evaluate past chemical use and soil contamination</li> </ul>	<ul style="list-style-type: none"> <li>• Street names are provided on all Figures 2.2-1 through Figure 4.14-1</li> <li>• Section 4.10 <i>Hazards and Hazardous Materials</i></li> </ul>

NOP Comment #1 - Mary Weiss

## Sergio Madera

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**From:** Mary Weiss <1163putnam@gmail.com>  
**Sent:** Friday, December 28, 2018 3:51 PM  
**To:** Sergio Madera  
**Subject:** North River Rd Project

Dear Mr. Madera,

It was so nice to talk with you the other day. We appreciate you taking the time to contact us. As I said, my husband and I live at 94 Avenida Descanso. We are the first house on the right as you turn from North River onto Descanso.

We believe in the public good and progress for our community. We have no general objections to the proposed project. People need a place to live!

Our concerns are for the impact the additional traffic will have on our street. Currently, there are many vehicles using the route from Old River to Descanso to North River as a short cut to avoid traffic and stoplights. Many drivers speed through with no thought of safety to our children or pets. With more residents living in the vicinity, we will definitely see increased traffic.

We have a few suggestions we feel should be considered by the City and the developer of the properties.

- Speed limit signs
- Better street lighting
- Additional stop signs along Descanso or at the corner of Old River and Descanso
- Speed barriers, if possible paid for by developer

Our other major concern is actually still about traffic. In case of a fire or other natural emergency, it will put both our neighborhood and the new complex's residents in greater danger as we attempt to evacuate in a timely manner. With the San Luis Rey River, there are only two means of egress from the area, Douglas Drive and College Blvd. During the Lilac Fire last year, there was gridlock in the process of evacuating. Plans must be developed to alleviate this potentially dangerous situation.

Thanks for your attention to this matter. Most assuredly, we will see you at the next meeting concerning this project.

Sincerely,

Mitchell and Mary Weiss

NOP Comment #2 - San Diego County Archaeological Society, Inc.



# San Diego County Archaeological Society, Inc.

Environmental Review Committee

29 November 2018

**RECEIVED**

DEC 4 2018

To: Mr. Sergio Madero, Senior Planner  
City of Oceanside  
300 North Coast Highway  
Oceanside, California 92054

**CITY OF OCEANSIDE  
DEVELOPMENT SERVICES**

Subject: Notice of Preparation of a Draft Environmental Impact Report  
North River Road Planned Block Development Overlay District  
GPA13-00001, ZA13-00001, D17-00007, and  
GPA13-00004, ZA13-00008, D17-00006


Dear Mr. Madero:

Thank you for the Notice of Preparation for the subject project, which was received by this Society last week.

We are pleased that cultural resources have been included in the list of subject areas to be addressed in the DEIR. In order to permit us to review the cultural resources aspects of the project, please include us in the distribution of the DEIR when it becomes available for public review. Also, in order to facilitate our review, we would appreciate being provided with one copy of the cultural resources technical report(s) along with the DEIR.

SDCAS appreciates being included in the environmental review process for this project.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: SDCAS President  
File

## NOP Comment #3 - Rincon Band of Luiseno Indians

## Sergio Madera

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**From:** Destiny Colocho <DColocho@rincon-nsn.gov>  
**Sent:** Wednesday, December 26, 2018 10:04 AM  
**To:** Sergio Madera  
**Subject:** North River Road Planned Block Development Overlay District

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Dear Mr. Madera

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your Notice of Preparation of an Environmental Impact Report (EIR) regarding the above referenced project and we thank you for the opportunity to consult. The identified location is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic interest.

Embedded in the Luiseño territory are Rincon's history, culture and identity. Rincon has knowledge of one Luiseño Traditional Cultural Place (TCP), *Tamiymay*, within a half mile of the project site. We request consultation at this time in order to learn more about the project and any potential impacts to cultural resources. In addition, we recommend that an archaeological record search and assessment be conducted as part of the EIR and ask that a copy of the results be provided to the Rincon Band.

If you have additional questions or concerns please do not hesitate to contact our office at your convenience at (760) 297-2635.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

\*Please note the change in email below. @rincontribute.org will still be operational until the end of 2018, but please update your contact list to reflect the change to @rincon-nsn.gov\*

**Destiny Colocho, RPA**

Cultural Resource Manager and Tribal Historic Preservation Officer  
Cultural Resource Department

**Rincon Band of Luiseño Indians**

1 West Tribal Road | Valley Center, CA 92082

Office: 760-297-2635 | Cell: 760-705-7171

Fax: 760-692-1498

Email: dcolocho@rincon-nsn.gov



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# NOP Comment #4 - San Luis Rey Band of Mission Indians

# SAN LUIS REY BAND OF MISSION INDIANS

*1889 Sunset Drive • Vista, California 92081  
760-724-8505 • FAX 760-724-2172  
www.slrmissionindians.org*

January 7, 2019

Sergio Madera  
Principal Planner  
Planning Division  
City of Oceanside  
300 N. Coast Hwy.  
Oceanside, CA 92054

**VIA ELECTRONIC MAIL**  
**SMadera@ci.oceanside.ca.us**

**RE: TRIBAL RESPONSE REGARDING THE NOTICE OF PREPARATION  
OF AN ENVIRONMENTAL IMPACT REPORT FOR THE NORTH  
RIVER ROAD PLANNED BLOCK DEVELOPMENT OVERLAY  
DISTRICT**

Dear Mr. Madera:

We, the San Luis Rey Band of Mission Indians (“Tribe”) have received and reviewed the City of Oceanside’s (“City’s”) Notice of Preparation (“NOP”) of a Draft Environmental Impact Report for the North River Road Planned Block Development Overlay District (“Project”) dated November 21, 2018 and inquiry whether the Tribe has any knowledge of cultural resources or sacred places that may be impacted by the proposed Project. The Tribe is also aware, from the NOP, that this Project requires a General Plan Amendments. To date, the Tribe has not received consultation notices for this Project pursuant to AB 52, nor SB 18. The Tribe is hopeful to consult with the City regarding this Project’s proposed General Plan Amendment and potential negative impact to our sacred tribal cultural resources within the immediate future.

As you are aware, we are a northern San Diego County Tribe whose traditional and culturally affiliated territory includes Camp Pendleton, the current cities of Oceanside, Carlsbad, Vista, San Marcos and Escondido, as well as unincorporated areas in northern San Diego County, such as the communities of Fallbrook, Bonsall and Valley Center. We are resolute in the preservation and protection of tribal cultural resources within all these jurisdictions.

Our Tribe is aware of a multitude of tribal cultural resources and sacred places within the proposed Project area. The Tribe strongly urges caution in assessing the land encompassing the this area for development purposes, as well as incorporating the presence of a Luiseño Native American monitor during all ground disturbing activities (including any geotechnical and/or exploratory excavations) and tribal cultural resource assessment surveys.

The Tribe has enjoyed a mutually respectful relationship with the City over the years and would appreciate an opportunity to continue to discuss this Project’s potential negative impact on

our Luiseño cultural resources via the statutorily mandated AB 52 and SB 18 requirements of government to government consultation.

We appreciate the opportunity to share with the City of Oceanside our concerns regarding this Project and thank you for your assistance in protecting our invaluable Luiseño Native American cultural resources.

Sincerely,

A handwritten signature in black ink, reading "Merri Lopez-Keifer". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Merri Lopez-Keifer  
Chief Legal Counsel  
San Luis Rey Band of Mission Indians

# NOP Comment #5 - Native American Heritage Commission

## NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
Phone (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>  
Twitter: @CA\_NAHC



RECEIVED

DEC 6 2018

December 3, 2018

Sergio Madera  
City of Oceanside  
300 North Coast Highway  
Oceanside, CA 92054

CITY OF OCEANSIDE  
DEVELOPMENT SERVICES

RE: SCH# 2018111034 North River Road Planned Black Development Overlay District, San Diego County

Dear Mr. Madera:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. **Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. **Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. **Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. **Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. **Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. **Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
  
8. **Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
  
9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
  
10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
  
11. **Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [Katy.Sanchez@nahc.ca.gov](mailto:Katy.Sanchez@nahc.ca.gov).

Sincerely,



for

Katy Sanchez  
Associate Environmental Planner

cc: State Clearinghouse

# NOP Comment #6 - California Department of Transportation

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11

4050 TAYLOR STREET, MS-240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Making Conservation  
a California Way of Life.***RECEIVED**

DEC 4 2018

November 30, 2018

**CITY OF OCEANSIDE  
DEVELOPMENT SERVICES**

11-SD-76

PM 5.023

North River Road Planned Black Development Overlay District  
NOP/SCH#2018111034Mr. Sergio Madera  
City of Oceanside  
300 North Coast Highway  
Oceanside, CA 92054

Dear Mr. Madera:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) for the North River Road Planned Black Development Overlay District Draft Environmental Impact Report (DEIR) located near State Route 76 (SR-76). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

**Traffic Impact Study**

A traffic impact study (TIS) may be necessary for future proposed projects within the overlay district depending upon density and individual projects' ADT.

Early coordination with Caltrans is encouraged. Future project applicant's may contact Caltrans District 11 IGR Branch for early project coordination.

**Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system.

Mr. Madera  
November 28, 2018  
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To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

### **Land Use and Smart Growth**

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

### **Mitigation**

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS/TIA. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

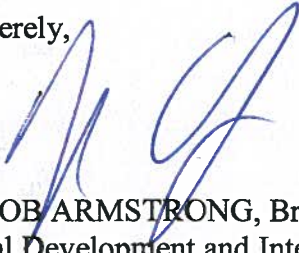
### **Right-of-Way**

Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans's R/W, and any corresponding technical studies.

Mr. Madera  
November 28, 2018  
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If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to [Kimberly.dodson@dot.ca.gov](mailto:Kimberly.dodson@dot.ca.gov).

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Local Development and Intergovernmental Review Branch

## NOP Comment #7 - Wittwer Parkin LLP

January 4, 2019

**Sent via Email**

Sergio Madera, Senior Planner  
Planning Division  
City of Oceanside  
Oceanside, CA 92054  
smadera@ci.oceanside.ca.us

**Re: North River Road Planned Block Development Overlay District**

Dear Mr. Madera:

This law firm represents the Southwest Regional Council of Carpenters (Southwest Carpenters) and submits this letter on the above-referenced project on its behalf.

Southwest Carpenters represents 50,000 union carpenters in six states, including in Southern California, and has a strong interest in ensuring well-ordered land-use planning and reducing the environmental impacts of development projects, such as the North River Road Planned Block Development Overlay District (Project). In its Notice of Preparation, the City of Oceanside (City) has determined the Project has the potential to cause significant impacts on the environment, such that the City will prepare a Draft Environmental Impact Report (DEIR).

The City describes the Project as a change of land use designations that would permit the development of medium-density residential housing of an undisclosed number of units on 25.6 acres. Approvals include:

- General Plan Amendment from Light Industrial to Medium Density – C Residential
- Zone Amendment from Limited Industrial to Medium Density Residential C
- Development Plan to establish a Planned Block Overlay District

The City does not reference the need to obtain any other state and federal approvals, such as a Section 401, 404 and NPDES permits, Endangered Species Act consultation or permit, or a Streambed Alteration Agreement. However, the Project appears to be located next to a stretch of the San Luis Rey River.

Southwest Carpenters presents limited comments in response to the Notice of Preparation, below. We look forward to providing more in-depth comments when the City releases a copy of the DEIR for the Project.

**Piecemealing**

The City is at risk of piecemealing its environmental review for the Project. Piecemealing occurs where the City submerges consideration of environmental impacts by chopping up a project into smaller ones, thus minimizing the environmental impacts of the Project. (*California Clean Energy Commission v. City of Woodland* (2014) 225 Cal.App.4th 173, 194.)

In its Notice of Preparation, the City states, “Approval of the Project would not include the construction of any buildings or development but would allow for development in the future. Future development plans would be submitted to the City of Oceanside for additional review to ensure that future development within the Project area meets the standards and goals of the City.” (NOP, p. 2.) However, there is no reasonable doubt that the Project site is slated for development. As the City is aware, the proposed General Plan Amendment, Zone Change, and Development Plan are requested by two companies interested in developing this property. The approvals suggested are specific to the Project site and cannot be compared to broader, citywide land use changes that may be untethered to any specific plans for development. The sole purpose for this site-specific General Plan Amendment and Zone Change is to develop the Project site, nothing else. These actions, and their intent, are far more than “an optimistic gleam in a [City] planner’s eye.” (*Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188, 195.) Thus, if the City describes and evaluates the Project as excluding the physical development of the Project site, it is at risk of impermissibly piecemealing its environmental review.

**Evaluation of All Environmental Issues**

In its DEIR, the City must provide a full analysis of all categories of environmental issues. While the Notice of Preparation suggests the City prepared an Initial Study, City staff has indicated the City did not prepare or circulate an Initial Study. CEQA Guidelines state the City is not required discuss any environmental effects “dismissed in an Initial Study as clearly insignificant.” (14 Cal. Code Regs. § 15143.) Here, the City must discuss all topics of environmental impacts required by CEQA in its DEIR, as it has not prepared or circulated an Initial Study.

**Agricultural Lands**

As the City states in the Notice of Preparation, much of the Project site is currently farmland. In the DEIR, please disclose whether this farmland is identified by the California Department of Conservation as Prime Farmland, Farmland of Statewide Importance, Unique

Farmland, or Farmland of Local Importance, or is the subject of a Williamson Act contract. If loss of this farmland is significant, please consider mitigating this loss by requiring the permanent preservation of farmland either on- or off-site.

### **Air Quality and Greenhouse Gas**

The City must disclose baseline air quality conditions of the Project area. Furthermore, the City must describe the impact the Project would have in comparison to this baseline, including any conflict with any air quality management plan in effect within the air basin. Importantly, the City must accurately describe cumulative air quality impacts in relation to the Project.

Regarding greenhouse gases, the City should quantify baseline greenhouse gas emissions, as well as any new emissions that will be caused by the Project and compare those emissions to a quantitative significance threshold to determine the significance of these impacts. Furthermore, the City should disclose whether it has promulgated a Climate Action Plan and, if so, whether the City is currently on track to meet the reductions goals of its Climate Action Plan, and whether this plan has been updated to reflect the greenhouse reductions from all applicable laws and policies.

The City should include all feasible mitigation to reduce Project air quality and greenhouse gas impacts. Mitigation measures should include:

- requiring the use of Tier-IV-Final off-road vehicles for construction;
- requiring installation of rooftop solar panels;
- installation of electric-vehicle chargers in parking spaces; and
- the purchase of carbon offsets.

### **Hazards and Hazardous Materials**

As the Project site has been historically used for agricultural and industrial purposes, please conduct extensive soil sampling. Older pesticides and industrial uses may have caused contamination that persists today, such that earthwork may expose workers and the River to hazardous substances.

Further, as the Project will include demolition of existing structures, please disclose whether this demolition may pose a health hazard, such as exposure to asbestos and lead-based paints.

Sergio Madera, Senior Planner  
Re: North River Road Planned Block Development Overlay District  
January 4, 2019  
Page 4

The Project is within one-quarter mile of at least one school, Nichols Elementary School. In the DEIR, please evaluate whether the Project has the potential to impact this school by handling or transporting hazardous materials or by creating hazardous emissions, such as diesel particulate matter (DPM).

### **Hydrology and Water Quality**

The Project site straddles a section of the San Luis Rey River (River) and, thus, poses a threat to the River's water quality and flows. In the DEIR, please evaluate the potential of the Project to negatively impact the River and mitigate these impacts to the greatest extent feasible.

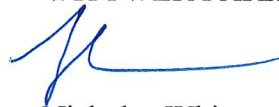
Because the Project will be sited directly adjacent to the River, the Project site may also be at risk of flooding or exacerbating a flood hazard. Please also discuss the potential of the Project to place people and structures such that they are at risk of injury, death, or damage.

### **Conclusion**

Southwest Carpenters thanks the City for providing an opportunity to comment on the Notice of Preparation. Pursuant to Section 21092.2 of the Public Resources Code and Section 65092 of the Government Code, Southwest Carpenters request notification of all CEQA actions and notices of any public hearings concerning this Project, including any action taken pursuant to California Planning and Zoning Law. In addition, pursuant to Public Resources Code section 21167(f), please provide a copy of each Notice of Determination issued by the City in connection with this Project and please add Southwest Carpenters to the list of interested parties in connection with this Project and direct all notices to my attention. Please send all notices by email, or if email is unavailable, by U.S. Mail to:

Nicholas Whipps  
Ashley McCarroll  
Wittwer Parkin LLP  
147 S. River St., Ste. 221  
Santa Cruz, CA 95060  
nwhipps@wittwerparkin.com  
amccarroll@wittwerparkin.com

Very truly yours,  
WITTWER PARKIN LLP



Nicholas Whipps

## NOP Comment #8 - Lawrence Burnett

North River Road Planned Block Development Overlay  
Comment on Draft EIR Content

December 4, 2018

Comments Submitted by:

Date: 12/24/18

Lawrence Burnett -

① Due to the problems with emergency ~~evacuation~~ ~~egress~~ from the entire surrounding area with the wildfires to the east, any increase in the footprint of the proposed property will result in a SERIOUS human danger.

People and vehicles were backed up trying to comply w/ mandatory evacuation orders; then with voluntary evacuation orders. There are really only 2 areas out - College of Douglas Rd

look at the possibility of another bridge over the San Luis Rey that could be a permanent structure. Or construct a bridge that could only be used by emergency personnel & vehicles.

② Privacy for the back yards of all of the property on Trinity St. Currently 10' SDOE easement, buffer needs to be increased & limits placed on the height of adjacent buildout to preserve the back yard privacy of current & future owners.

Please return written comments by January 4, 2019 to:

Mr. Sergio Madera  
Oceanside Planning Division  
300 North Coast Highway  
Oceanside, CA 92054  
smadera@ci.oceanside.ca.us

Project Representative:

Dan Niebaum (760) 692-1924  
The Lightfoot Planning Group  
5900 Pasteur Court, Suite 110  
Carlsbad, CA 92008  
dan@lightfootpg.com

NOP Comment #9 - Anonymous Commenter

**North River Road Planned Block Development Overlay  
Comment on Draft EIR Content**

**December 4, 2018**

Comments Submitted by:

Date:

*Do there any change to flood protection  
in the proposal?*

*Dec 4, 2018*

*Percentage of applicants satisfied by  
low-income housing by project at  
Mission & Airport Rd.*

*Dec 4, 2018*

**Please return written comments by January 4, 2019 to:**

Mr. Sergio Madera  
Oceanside Planning Division  
300 North Coast Highway  
Oceanside, CA 92054  
smadera@ci.oceanside.ca.us

**Project Representative:**

Dan Niebaum (760) 692-1924  
The Lightfoot Planning Group  
5900 Pasteur Court, Suite 110  
Carlsbad, CA 92008  
dan@lightfootpg.com

## NOP Comment #10 - John and Maria Cofey

North River Road Planned Block Development Overlay  
Comment on Draft EIR Content

December 4, 2018

Comments Submitted by: John Cofey and  
Maria Cofey

Date: 12/4/2018

Security issues

Privacy issues (easement behind homes near fence, <sup>2 to 3 story</sup> homes - no privacy)

Emergency Egress/exit

Environmental impacts of soil (chemicals)

Parking concerns (cars parking <sup>guest parking</sup> in community; not enough parking)

Traffic Issues (avenida descanso to Old River Rd)

Health Issues

Air Quality Issues

Greenhouse gas emissions

Noise (all types)

Power/Electricity concerns

Biological Issues/resources

Flood protection - near riverbed

Energy concerns

Will affordable housing be an issue?

Email: thecofeys@cox.net

(I would like a copy of the brief.)

Please return written comments by January 4, 2019 to:

Mr. Sergio Madera  
Oceanside Planning Division  
300 North Coast Highway  
Oceanside, CA 92054  
smadera@ci.oceanside.ca.us

Project Representative:

Dan Niebaum (760) 692-1924  
The Lightfoot Planning Group  
5900 Pasteur Court, Suite 110  
Carlsbad, CA 92008  
dan@lightfootpg.com