



Imagine  
Carlsbad

## CARLSBAD'S NEW CITY HALL / CIVIC CENTER

Jan 1 2021

### Geo-Centric or Historic Heart

Ask pretty much anyone, they will say ***Carlsbad is a very nice place***. People from other areas usually say “you are fortunate if Carlsbad is where you call home. To continue that status the City Council now has a major question needing to be answered. ***That question is where to place our new and final City Hall and how to also make it a Civic Center.*** Not an easy decision so we ask that the following input be considered. We all know the City has been defined on paper as having four different zip code quadrants separated by our two largest roadways. It is now defined by four voting districts mostly cutting east to west. ***We also know that the major residential areas are positioned north and south generally separated by the airport and its influence on adjacent land uses.*** We know that the vast majority of Carlsbad was laid out and built under the land planning model of “***suburban-ization***” This doctrine came about in the early 1950s. It's where all different land uses are separated in their own areas. This separation was meant to reduce the possible conflicts between different uses which had been somewhat common up to that time. This separation requires one additional element that would make it possible for this new form of town planning. It requires a full network of roadways for the automobile to tie all areas together into a workable land use fabric. However, one area of Carlsbad is different as it was laid out and built under a different land planning program now referred to as “***Traditional Town Planning***”. That area was the city's starting point, a start that took place much earlier. Its planning program built a relatively small multi-use core area on a tight grid of Main Street type thoroughfares. This gives that area, the Village-Barrio, ***a different and unique character in all of Carlsbad.***

***Now the question of where to put our City Hall.*** An opportunity to create a new Flagship facility with civic amenities that will be embraced as a proud symbol representing our community. It should be a model of City government ***efficiency and professionalism. A symbolic element that reinforces its general location as a “point of focus” for the community, a Town Center.***

**MID CITY** - Two sites that are geo-centric to be more equal distant from both south and north areas of town.

**NORTH WEST CORNER** - The two sites that will support of the City's Historic Heart Neighborhood (the Village / South Village - our Historic Barrio).

### **OUR CRITERIA FOR EVALUATING THESE POTENTIAL SITES**

- ★ City Hall as a highly productive and stimulating work place environment
- ★ Accessibility for Employees, Business Guest & the Community
- ★ Presences/Imagery - A Flagship facility with high visibility that represents our community Pride
- ★ Civic Amenities for the community
- ★ ***Its relationships with its surrounding area Synergy & Symbiotic (2+2=5)***

Back to Carlsbad being a great place to live. Taking this as a given can we now pause and reflect on all that we have, all that we done but also do some ***objective evaluation of what we may have missed, what we may be lacking?*** This review should influence the evaluation of where our ultimate City Hall should be placed. What ingredient might be needed to strengthen our community, to its sense of place, its sense of identity and pride. The element that should have come out of that objective evaluation as missing is a Town Center. As far as we know a ***Town Center*** has never been put on any map, never been part of any plan in all of our town planning. ***We submit that a recognizable Town Center is very important to a city the size of Carlsbad adding to our community's sense of place, identity and pride.***

***All along our town planning journey we have had the "Historic Heart", the starting point of town but we really never saw the need to fully wrap our arms around it.*** To elevate it as our point of focus for the full community as a recognized Town Center. "It is up there in the far corner", "shouldn't a town center be in the center of town?" It's our starting point and hence it was logically located on the coast line, on the regional highway, on the rail line. Yes today it is the NW corner of our town just one of the city's four corners. The flip side of this can be expressed in one word, ***"Car-nitas"***. This term, we have heard, is used by some who live in south Carlsbad but have a Encinitas state of mind. Why do these people relate more to Encinitas, certainly it has nothing to do with their City Hall.



***However, this should be seen as a tear in our community's fabric of cohesiveness and belonging.*** Some believe the fix is to place our "seat of power" the City Hall in the center of town so it is seen as equal in its reach and representation. "That makes sense on paper", as they say, if centered it is equal right?. However the next question is, does that get us where we should want to be, is it really just that simple, we think not. ***Rarely is a City Hall on its own a Town Center***, an important part yes but as a stand alone facility it is hard pressed to pull that kind of weight. Make it a Civic Center by adding civic amenities, like a learning center/Library with auditorium or exhibit hall, already done ***at "the Dove" along with another civic staple a Federal Post Office***, or may be give it a larger performing arts venue. An objective evaluation will show that it will be very difficult if not impossible to create a true Town Center at the mid City sites. As we know, we already own land in the Center of town. Rather than place ***a stand alone City Hall at Farmers***, as an island in the employment center sea. May be we make that site a different feature for the community, a larger performing arts venue, say an amphitheater. May be not, as we did have one of these proposed in our town some time back. But due to the cold shoulder reaction it received here that proposal moved on to Poway. It then lost out in a head to head competition with a proposal for a theater in Chula Vista. How many of us in Carlsbad want to travel to Chula Vista or even S.D. State to go to a performance in an amphitheater? But nice if we had that venue close in.

***If we can agree that our community will benefit significantly by having a strong Town Center, a point of focus for all of us.*** If we can agree to have a Town Center as a new and major goal (a Council Goal) and also agree that the City Hall should be placed at our Town Center. We should take into consideration how the four candidate sites for City Hall measure up to a set of criteria for this role as a flagship facility, as an important part of the community's Town Center. As has been expressed, if a mid city locations have little chance to become a strong and meaningful Town Center then where? The Village also does not currently carry that weight. However, unlike mid town it does have that potential, it's just not there yet. So the real question here is what must we do to make it so. ***To make the Village a true Town Center that has that weight, that gravity to draw all of us to it, even those "Car-nitas". But that is a topic for another session, another paper. A session to tackle that question, and to ask if we have that kind of vision, that kind of resolve to strengthen Carlsbad as a community made whole with a compelling Town Center ?***



*Imagine  
Carlsbad*

## **WHAT MAKES FOR A SUCCESSFUL TOWN CENTER** Jan1 2021

A Center with many activities and services creating a significant draw that becomes a local attraction, a destination for the entire community.

A Center that provides a special setting assisted by its character and ambiance enhancing the community's sense of place, identity and pride.

A Center that is easy to locate, offers easy access and has adequate fundamentals for all its uses and planned events.

A Center that can host a full range of special events throughout the year.

A Center where there are strong public/private partnerships and many active community groups.

A Center strengthened by the inclusion of the town's Seat of Power (City Hall) placed at a location of prominence and status. A flagship facility that also offers as many features for community use as its layout can accommodate.

A Center with a high level of authenticity and/or heritage, it is optimal if the location has an innate quality to it. Something special took place there, something special was built there, something was started at this location that has meaning to the community. This should enhance its prominence and status adding depth in the community's sense of time, sense of longevity.

A Center with ample public land, although the center can include a mix of both public and private properties, it must be rich in our public domain. Allowing easy public movement unencumbered by private rights. A location where there are also ample areas for the public to gather. Where one gathering location is widely held to be the venue for public expression. Where the community comes together to hold a hand over heart, where they push both hands high into the air with movement and rhythm, where, after sunset, they hold lights tight in hand as an expression of a collective spirit.



**From:** [Lance Schulte](#)  
**To:** [Eric Lardy](#); [Council Internet Email](#); [City Clerk](#); [Kyle Lancaster](#); [Boyle, Carrie@Coastal](#); ["Prahler, Erin@Coastal"](#); [Ross, Toni@Coastal](#); [Don Neu](#)  
**Cc:** [info@peopleforponto.com](#)  
**Subject:** Public input to Carlsbad Tomorrow Growth Management Committee & CCC - Parks & Unconstrained-Useable Open Space facilities  
**Date:** Monday, May 30, 2022 1:23:48 PM  
**Attachments:** [Carlsbad 2019 proposed Draft LCP Amendment - People for Ponto 2021-Oct Updated Public Comments - Coastal Recreation.pdf](#)  
[Sea Level Rise and Carlsbad DLCP-LUPA planned loss of OS at Ponto - 2022.pdf](#)  
[2022-June General Comparative cost-benefits of Completing PCH-PCH Modification-Ponto Park - Part 1 of 2.pdf](#)  
[City's PCH area map w numbered notes of Constraints - 2 of 2.pdf](#)  
[Carlsbad FY 2019-20 Budget Public Input Report - Summary analysis for Public Comments on Budget-DLCPA-PMU.pdf](#)

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Dear Carlsbad Tomorrow Growth Management Committee, Carlsbad Council and Parks and Planning Commissions, & CA Coastal Commission:

The Committee is tasked with recommending to the Council proposed changes to City Park and City Unconstrained/Useable Open Space Standards within the Growth Management Program Update.

Because Carlsbad is quickly running out of vacant land, the Committee's recommendations are critical for very obvious reasons. The Committee will be recommending (for all future generations) the final methods to supply Citizen desired Parks and Unconstrained/Useable Open Space. It is important the Committee wisely represent the interests of those future generations. The Park and Open Space supply solutions for future generations will amend Carlsbad's updated 2015 General Plan and the "as of 2013" Local Coastal Program.

Since 2017 many People for Ponto Carlsbad Citizens have overwhelmingly expressed their need and desire for:

1. Fairness, and a true adequately sized and dimensioned Ponto Park to address City Park Master Plan documented "lack of Park Service and Park Inequity" in this area, and
2. Correcting the City's documented 30-acre shortfall in required Unconstrained and Useable Open Space in the Ponto area, and
3. Correcting the City's planned loss of 32+ acres of Coastal Open Space at Ponto (the State Campground and Beach) first documented in 2017 and thus not a part of the City's General Plan & Growth Management Program.

Since 2017, over 5,000 Carlsbad Citizen and visitor petitions have been sent to the City & Coastal Commission expressing the desire and need of both Citizens and visitors to have these Parks and Open Space issues addressed. The Council has been narrowing deferring addressing these issues and noted waiting for the Carlsbad Tomorrow Growth Management Committee to consider both the data and Citizen and visitor desires.

Attached are 5 data files sent to the City by Carlsbad People for Ponto. The data files were sent as comments to the City's proposed Local Coastal Program (LCP) Amendment that seeks to change Carlsbad's 2013 LCP with the outdated 2015 General Plan, Carlsbad's Park Master Plan Update process, and the Growth Management Program that your Committee will be making recommendations to change. People for Ponto Carlsbad Citizens conducted over 50 official Carlsbad Public Records Requests to compile this data. We provide these data files in preparation of your

June 23<sup>rd</sup> meeting.

1. Coastal Recreation and comparative Park data: Summary data on supply/demand/distribution-fairness of City Parks in Carlsbad, unflattering comparative data on how much parkland and where Carlsbad provides Parks relative to Encinitas and Oceanside and national averages, documents Carlsbad's Park Master Plan mapping Park distribution unfairness at Ponto, and documenting that many Carlsbad's Park acres are Unusable for people because they are constrained habitat land protected from human use/intrusion.
2. Sea Level Rise & Carlsbad planned loss of Open Space at Ponto: A) Summary data on how sea level rise (SLR) will remove Open Space at Ponto. B) City GIS maps/data that shows 30-acres of required Unconstrained/Useable Open Space was not provided at Ponto (Zone 9) by using false exemptions while similar and adjacent Local Facility Management Zones (19 & 22) provided their required Unconstrained/Useable Open Space. C) City maps and data tables documenting the both loss of Open Space at Ponto from SLR and the missing Growth Management Open Space at Ponto.
3. Updated 2022-June Comparative Cost-Benefits of PCH Modification and Ponto Park: A) Summary City data comparing the Citizen and tax-payer Cost-Benefit of Park and Useable Open Space alternatives at Ponto. The data file initially compared cost-benefits of the 11-acre Ponto Planning Area F and pre-2022 City Cost data. However in May 2022 the City updated its PCH Relocation costs, and a willing seller of 14.3 acres of adjacent land (Ponto Planning Area G, H, and I; aka Kam Sang) was listed for sale. B) The Kam Sang list price of \$2.7 million per acre or a bit more than the \$2.4 to \$1.4 million per acre price of recent Ponto land sales noted in the file but are close. C) The City's updated PCH Relocation Costs are similar. The Cost-Benefit Comparison still shows purchasing Ponto Park land is still a better value for Carlsbad Citizens, and saves tax-payers money. The Comparison references a City map and data showing sea level rise impact areas, and the City's PCH Relocation environmental and design constraints.
4. Citizens' City Budget Ponto Park need-requests: A) Summary data and verbatim documentation of Carlsbad Citizens requests to budget to address the need for Ponto Park, and Open Space issues at Ponto. B) The volume of Citizen input on Ponto Park and Open Space, and the actual verbatim Carlsbad Citizen comments should be considered. C) In addition since 2017 when Carlsbad Citizen first became aware of several Ponto Planning Mistakes by the City:
  - a. false Growth Management Unconstrained/Useable Open Space 'Standard exemption' at Ponto
  - b. failure in the 2010 Ponto Vision Plan that is the basis for the 2015 General Plan Update, and the failure of the 2015 General Plan Update to follow the 1996 Local Coastal Program Land Use Policy for Planning Area F that required the City to consider and document the need for Coastal Recreation (i.e. Public Park) and Low-cost Visitor Accommodation land use prior to proposing a change in the Non-residential Reserve land use policy. Failing to fully disclose the Coastal Commission's rejection of the Ponto Vision Plan in 2010 because of these reasons, and not disclosing 2016, 2017 and 2022 directions to the City..
  - c. SW Quadrant Park deficits going back to 2012



- d. Not considering 2017 Sea Level Rise Impact Report that shows the loss of 32+ acres of high-priority Coastal Open Space land uses at Ponto.
- e. As a corollary example, the City has additional history in collaborating with developers to skirt standards and allow development without developers providing their required public facilities - the Rosalena HOA Trail segment of the Batiquitos Lagoon Bluff-top trail at Ponto is a classic example. This example resulted in delaying construction of the public trail by over 35-years and ended up costing about 75 Carlsbad homeowners over \$1 million in additional costs. It almost resulted in no trail being built and City and/or developer pocketing money meant to pay for the trail. This scenario could happen a far larger scale and cost if Ponto developers are not required to provide the missing 30 acres of required Useable Open Space at Ponto

Carlsbad People for Ponto Citizens have asked the City to provide the Citizen input since 2017 for all things Ponto related. Reviewing the public record of 5,000+ citizen communications since 2017 reveals only maybe a dozen (mostly developer paid or supported) are not in support of Ponto Park. Your fellow Carlsbad Citizens ask the Growth Management Committee to read their input and to consider future generations.

Thank you for serving on the Growth Management Committee. You each have a large and vital task, as your recommendations will be the beginnings of what (due to Carlsbad running out of vacant land) will be the 'final glide path' that forever defines Carlsbad's Quality of Life. After your recommendations, there will only be added population demands on the public facilities. As more infill development is added and there may be no vacant land to provide needed supplies of facilities like Parks and Unconstrained/Useable Open Space.

I speak from having already professionally followed the path you are on. After working on Carlsbad's Growth Management Program in the mid-1980s I addressed this same issues for the then new City of Dana Point that (in 1989) was at a similar stage of 'near buildout as Carlsbad is now.

Based on my professional experience I implore you seriously and fully consider that data and desires your fellow Carlsbad People for Ponto Citizens have provided you and the City. Based on where Carlsbad is we, and you, will only get this one chance to get it right.

Sincerely,  
Lance Schulte  
35-year Carlsbad resident  
former Carlsbad Growth Management and Dana Point city planner

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Updated Pubic Comments Coastal Recreation submitted on Oct 12<sup>th</sup> 2021:

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On 10/8/21 the Carlsbad City Council and CA Coastal Commission were emailed data from an Official Carlsbad Public Records Request (# R002393-092121) on the City of Carlsbad's past compliance/noncompliance with the currently exiting Mello II LCP Land Use Policies # 6-2, 6-4 & 6-10 Certified in the mid-1980s. The City's documents show:

- For Policy 6-2 the 200-300 acre Park called out in Policy 6-2 has been reduced to Veterans Park's 91.5 acres, of which only 54% or 49.5 acres is even useable as a Park. The City provided no documents on how a 200-300 acre park called for in Policy 6-4 is now only 49.5 useable acres.
- For Policy 6-4 there were no City documents were provided. There was no City Public discussion, consideration, or City compliance with Policy 6-4 since the mid-1980's.
- For Policy 6-10 concerns providing Low Cost Visitor Accommodations. Public Parks are the lowest cost (free) Visitor accommodating land use there is.

The 3 existing LCP Land Use Policies are important for Carlsbad, and California's, Coastal land use resources. There appears little to no discussion of the City's past apparent failure to implementation of these 3 LCP LUPs in the current City consideration of changes to the LCP.

Following is a copy of Public Records Request # R002393-092121: "Carlsbad's Local Coastal Program (LCP) for the Mello II Segment of Carlsbad's Coastal Zone has long established land use Policies 6-2, 6-4 & 6-10 that were adopted by Carlsbad and Certified by the CA Coastal Commission in the early/mid-1980's. Mello II LCP Policies 6-2, 6-4 & 6-10 are shown on page 86-87 of Carlsbad's 2016 compiled LCP and are:

- "POLICY 6-2 REGIONAL PARK: If the population of Carlsbad increases in accordance with SANDAG's projected Series V Population Forecasts, it is estimated that Carlsbad will need to develop a new regional park containing 200 to 300 acres in order to adequately serve the public. A location for a new regional park must, therefore, be established. Consideration should be given to a facility within the Aqua Hedionda Specific Plan Area, or adjacent lands. The Batiquitos Lagoon area should also be considered.
- POLICY 6-4 NEED FOR ADDITIONAL OVERNIGHT CAMPING: Additional overnight camping facilities, the main source of lower cost visitor and recreational facilities, are needed throughout the San Diego coastal region. Additional facilities of this kind should be provided in a regional park within the Carlsbad area. This can be accomplished in conjunction with an eventual Batiquitos Park, within the Aqua Hedionda Specific Plan Area, and/or along with the development of private recreational facilities.
- POLICY 6-10 LOWER COST VISITOR-SERVING RECREATIONAL USES: Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Encourage a range of affordability for overnight visitor accommodations. Evaluate the affordability of any new or redeveloped overnight visitor accommodations, including amenities that reduce the cost of stay. Mitigation may be applied to protect and encourage affordable overnight accommodations"

The public record request is to see documents of:



- City Staff reports, presentations and communications to the Carlsbad Planning and Parks Commissions, and City Council regarding the City's consideration and implementation of these 3 specific (6-2, 6-4, and 6-10) Mello II LCP land use policies; and
- Carlsbad Planning and Parks Commissions, and City Council minutes, resolutions and ordinances documenting City of Carlsbad consideration and implementation of these 3 specific (6-2, 6-4, and 6-10) Mello II LCP land use policies."

Updated Pubic Comments Coastal Recreation submitted on January 2021:

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Over 11-months ago in a 1/29/20 1:56PM email People for Ponto Carlsbad citizens first provided the City of Carlsbad both data and comments on **14 critical Coastal Recreation issues (see pages 5-30 below)**. The data and the 14 critical issues do not seem to be receiving appropriate disclosure/presentation/discussion/consideration in the Dec 2, 2020 Staff Report to the Planning Commission. To assure the 26-pages of citizen data and requests in the 1/29/20 email was received by the Planning Commission the file was re-emailed on 12/22/20 12:24pm and specifically addressed to City Council, City Clerk, Planning Commission, Parks Commission, Housing Commission, HEAC, CA Coastal Commission, and CA HCD. As citizens we request each of these 14 data points (with supporting data) be honestly considered.

In reading the Dec 2 Staff Report citizens conducted additional analysis of City Park data. That research further reinforces and documents the 14 Critical Coastal Recreation issues and highlights the relatively poor amount of City Park and Coastal Recreation planned by Carlsbad's Staff proposed Draft LCP-LUPA. We hope the City Council and City Commissions, and CA Coastal Commission & HCD will consider this additional analysis of City data and citizen input:

<u>Coastal Zone data</u>	<u>Carlsbad</u>	<u>Oceanside</u>	<u>Encinitas</u>	<u>note or source</u>
Coastline miles	6.4	3.9	6.0	Carlsbad Draft LCPA 201, Google Maps
Coastal Zone Acres	9,219	1,460	7,845	& Oceanside & Encinitas LCPs
Coastal Zone Acres	100%	16%	85%	% relative to Carlsbad

<u>City Park Standard data</u>				
City Park Standard	3	5	5	required park acres / 1,000 population
Park Standard %	100%	167%	167%	% is relative to Carlsbad

- Oceanside & Encinitas 'require' and plan for 67% MORE Parkland than Carlsbad
- Carlsbad 'requires' and plans for ONLY 60% as much Parkland as Oceanside & Encinitas
- Carlsbad only requires developers provide 60% of the parkland (or in-lieu fees) as Oceanside & Encinitas require
- Encinitas has a 'Goal' to provide 15 acres of Park land per 1,000 population

Developed City Park	2.47	3.65	5.5	acres / 1,000 population
Developed Park	100%	148%	223%	% is relative to Carlsbad
<ul style="list-style-type: none"> <li>• Oceanside provides 48% MORE developed park land than Carlsbad</li> <li>• Encinitas provide 123% MORE developed park land than Carlsbad</li> <li>• Carlsbad ONLY provides 68% and 45% as much Parks as Oceanside &amp; Encinitas respectively</li> </ul>				

National Recreation & Park Asso. Metric: a typical City provides 1 park / 2,281 pop. & 9.9 Park acres / 1,000 population

- Carlsbad (3 acre) Park Standard is ONLY 30% of what a typical City provides nationally
- Carlsbad requires developers to provide, 70% LESS Park acres than typical City provides nationally

National Recreation & Park Asso., Trust for Public Land, et. al.: 10 minute (1/2 mile) Walk to a Park Planning Goal

- Both Oceanside and Encinitas plan parks to be within a 10-minute (1/2 mile) walk to homes.
- Carlsbad DOES NOT plan Parks within walking distance to homes
- Carlsbad is NOT providing equitable and walking/biking access to Parks

Some Carlsbad Parks that are not fully useable as Parks:

Existing Parks with Unusable Open Space acreage	total park acres	Unusable park acres	% of park unusable	<u>reason unusable</u>
Alga Norte - SE quadrant	32.1	10.7	33%	1/3 of park is a Parking lot not a park In many other Carlsbad Parks a significant percentage of those Parks are consumed by paved parking lots and unusable as a Park.
Hidden Hills - NE quadrant	22.0	12.7	58%	city identified unusable habitat open space
La Costa Canyon SE quadrant	14.7	8.9	61%	city identified unusable habitat open space
Leo Carrillo - SE quadrant	27.4	16.5	60%	city identified unusable habitat open space
Poinsettia - SW quadrant	<u>41.2</u>	<u>11.1</u>	<u>27%</u>	city identified unusable habitat open space
Existing Park subtotal	137.4	59.9	44%	44% of these Parks are unusable as Parkland

Anticipated Future Park  
development projects  
Park - quadrant

Veterans - NW	91.5	49.5	54%	estimated unusable habitat open space
Cannon Lake - NW	6.8	3.4	50%	estimated unusable water open space
Zone 5 Park expansion - NW	9.3	0	0	appears 100% useable as a Park
Robertson Ranch - NE	<u>11.2</u>	<u>0</u>	<u>0</u>	appears 100% useable as a Park
Future park subtotal	118.8	52.9	45%	45% of Future Parks are unusable as Parks

**Unusable Open Space acres**

**in Existing & Future Parks**      256.2    112.8      44%      **112.8 acres or 44% is unusable as Parks**

- 112.8 acres or 44% of the Existing & Future Parks are unusable Open Space and can't be used as Parkland
- **Based on City's minimum 3-acres/1,000 population Park Standard, 112.8 acres of Unusable Parkland means 37, 600 Carlsbad Citizens (or 32.5% of Carlsbad's current population of 112,877) will be denied Parkland that they can actually use as a Park.**
- 112.8 acres of Existing & Future unusable 'park' / 3 acre park standard x 1,000 population = 37,600 Carlsbad citizens without useable parkland per City minimum standard.
- **59.9 acres of Existing unusable 'park' / 3 acre park standard x 1,000 population = 19,967 Carlsbad citizens and their children are currently being denied useable park land. 19,967 is 17.7% of Carlsbad's current population.**
- In addition to these 19,967 existing citizens and their children denied park land, the City needs to develop additional Park acreage in the NE, SW and SE quadrants to cover current shortfalls in meeting in the minimal 3 acre/1,000 population park standard for the current populations in the NE, SW and SE quadrants.
- **The current NE, SW and SE quadrants park acreage shortfalls are in addition to the 19,967 Carlsbad citizens and their children that do not have the minimum 3 acres of parkland per 1,000 population**
- **Current FY 2018-19 MINIMUM park acreage shortfalls are listed below. They are:**
  - 4.3 acres for 1,433 people in NE quadrant,
  - 6.8 acres for 2,266 people in SW quadrant, and
  - 2.3 acres for 767 people in SE quadrant

Shortfall (excess) in  
Current Quadrant  
Park standard by



	<u>acres</u>	<u>population need</u>	<u>Future Park</u>		<u>existing Park shortfalls are for NE, SW &amp; SE quadrants</u>
			<u>acres</u>	<u>%</u>	
NW quadrant	(-14.2)	(-4,733)	107.6	91%	Current NW parks are 14.2 acres over min. standard & capacity for 4,733 more people at min. park standard. 91% of all Future City Parks are in NW quadrant
NE quadrant	4.3	1,433	11.2	9%	Future Park will exceed minimum NE park standard
SW quadrant	6.8	2,266	0	0%	No min. parks for 2,266 people in SW quad. Park deficit
SE quadrant	2.3	767	0	0%	No min. parks for 767 SE quadrant Park deficit

A Park Standard minimum is just a “Minimum”. City policy allows the City to buy/create parks above the City’s current 3 acre/1,000 pop. MINIMUM (and lowest) Park Standard of surrounding Coastal cities. Carlsbad already did this in the NW quadrant. It then added 3.1 more NW quadrant Park acres as part of the Poinsettia 61 Agreement. Poinsettia 61:

- converted 3.1 acres of NW City land planned/zoned for Residential use to Open Space Park land use/zoning,
- facilitated a developer building condos (increasing park demand) in the SW quadrant,
- required the SW Quadrant developer pay \$3 million to build the 3.1 acre NW quadrant park, and
- required the SW Quadrant developer pay to convert 3.1 acres of NW Quadrant & 5.7 acres of SW Quadrant City Park land to habitat that will be unusable as a City Park.

So Poinsettia 61 increased SW Quadrant development (that both increased SW Park Demand and expanded the current SW Quadrant Park deceit) while simultaneously using SW Quadrant development to pay for the conversion of 3.1 acres of residential land in the NW Quadrant to City Park (the NW Quadrant already has surplus park land per the City’s minimum standard).

People for Ponto strongly supports creating City Parks above the City’s current low 3-acre per 1,000 population minimum, as the City’s minimum standard is relatively low and substandard relative to other cities; many Carlsbad parks have significant acreage that is in fact ‘unusable’ as a park. Most importantly People for Ponto Citizens think it is very important to prioritize providing City Parks in areas of Park Inequity that are unserved by City Parks. However it seems very unfair to the SW Quadrant citizens to be so unserved and starved of the bare minimum of City Parks while at the same time funding City Parks in excess of City standard in other Quadrants.

The Poinsettia 61 illustrates a larger unfair (and dysfunctional) distribution of Quadrant based City Park demand and supply that is keenly evident in the demands/supply funding and location disparity of Veterans Park. Most all the development impact and park demand that paid Veterans Park fees came from the SW, SE and NE Quadrants yet the Veterans Park (supply) is not in those SW, SE and NE Quadrants. This inequity is counter to the implicit City requirement that City Parks be provided within the Quadrant of their Park demand. It is logical and proper that City Parks be provided and equitably distributed to be close to the development and population that generated the demand for that Park.

The City Park inequity at Ponto and in other Coastal areas of the City is counter to several CA Coastal Act policies; counter to good city planning and good CA Coastal planning; is highly detrimental to the City, City and CA citizens in the long-term; fails to properly distribute and match the location supply with the location of demand for Parks; and is counter to basic fundamental issues of fairness. Since 2017 People for Ponto has tried to get the City Council and City Staff to address this inequity, specifically at Ponto, and to do so in a way that embraces a true and honest Citizen-based planning process.

## Coastal Recreation:

2. Request that the City as part of its Draft LCP Public Review process broadly-publicly disclose to all Carlsbad Citizens the City's acknowledged prior LCPA processing and planning "mistakes" regarding the requirement that the Ponto area be considered as a public park: This disclosure is needed to correct about 20 years of City misrepresentation to the public on the since 1996 and currently Existing LCP requirements at Ponto, and the City's prior planning mistakes at Ponto. Citizens have been falsely told by the City that all the Coastal planning at Ponto was done already and that the City followed its Existing LCP regarding the need for a park at Ponto, and that this is already decided and could not be reversed. This misinformation has fundamentally stifled public review and public participation regarding the Coastal Zone. City failure to provide such a broad-public disclosure on the documented prior, and apparently current proposed, "planning mistakes" would appear to violate the principles of Ca Coastal Act Section 30006. A broad-public disclosure would for the first time allow citizens to be accurately informed on the Existing LCP requirements at Ponto so they can provide informed public review and comment regarding the need for a Coastal Park in in this last vacant 'unplanned' area. The requested broad-public disclosure by the City of the City past mistakes and the Existing LCP requirements at Ponto is consistent with CA Coastal Act (CCA) "Section 30006 Legislative findings and declarations; public participation - The Legislature further finds and declares that **the public has a right to fully participate in decisions affecting coastal planning**, conservation and development; that achievement of **sound coastal conservation and development is dependent upon public understanding and support**; and that the continuing planning and implementation of **programs for coastal conservation and development should include the widest opportunity for public participation.**" The public cannot participate as outlined in CCA Section 30006 if past City 'mistakes' and misrepresentations on Coastal planning at Ponto go undisclosed to the public. If the public isn't fully informed about the 20-years of LCP planning mistakes at Ponto how could the public in the past (and now in the present) participate in the proposed LCP Amendment – **Public Participation as noted in Section 30006 above is the means to sound coastal conservation and development and is "... dependent upon public understanding ..."**. The City's past mistakes at Ponto need to be corrected by slightly different a Draft LCP Amendment process than currently outlined by the City; a new process is needed that clearly, opening and honestly informs and engages the public on the Existing LCP Ponto issues. The City's current Draft LCP Amendment process fails to follow CCA Section 30006 in that most all the citizens we encounter are as yet unaware of the City's Ponto mistakes and how they can participate in in the DLCPA process without that information. We see this daily in conversations we have with our fellow citizens. We even saw at the Oct 20, 2019 Carlsbad Planning Commission meeting that the Planning Commission was unaware of the planning mistakes at Ponto. How can a decision body of the City make a decision without knowing about these prior 'planning mistakes' facts that surround what they are being asked to decide on? Repeatedly since 2017 Carlsbad citizens and People for Ponto have asked the City to fully acknowledge the City's prior flawed planning at Ponto, and to correct that with either maintaining the Existing LCP Non-residential Reserve Land Use or restarting the Coastal Planning at Ponto with a true and accurately informed Community-based Coastal Planning process consistent with Section 30006.

We request the City during the DLCPA Public Review period broadly and publicly disclose to all Carlsbad Citizens the City's acknowledged prior LCP and other "planning efforts" public participation processing and planning "mistakes" regarding the requirement that the Ponto area be considered as a public park, and 1) provide a truly honest public participation process on that disclosure consistent with CCA Section 30006 as part of the Draft LCP Amendment process or 2) retain the Existing LCP Non-residential Reserve Land Use and require a comprehensive and honest community-based redo of Coastal Resource planning at Ponto.



3. City fully and publicly reply to and the City Council consider the 11-20-19 citizen concerns/requests regarding the City's proposed LCP Amendment process: Lance Schulte on 1/23/20 received an email reply by the City to his follow-up email regarding the status of the 11/20/19 citizen concerns/requests public comments and letters presented to the Planning Commission. This is appreciated, however it is request that the City fully publicly reply to the 11-20-19 citizen concerns/requests regarding the City's proposed LCP Amendment process and present the to the City Council 11/20/19 citizen concerns/requests so the City Council can consider them and provide any direction to City Staff. City Staff first presented a summary presentation of the proposed Draft LCP Amendment to the Carlsbad Planning Commission on November 20, 2019, and indicated the public comment period would close on November in less than 2-weeks. Citizens and citizen groups provided public testimony to the Planning Commission, both verbally and in two written letters. The CCC was copied on those letters. The testimony and letters noted significant concerns about the City's proposed LCP Amendment process and made three requests:
- Disclose and provide a publically accessible 'Redline Version' of the Existing 2016/Proposed LCP land use Plan and Policies so everyone can see the proposed changes to the Existing LCP.
  - Provide true Citizen Workshops on the major remaining vacant Coastal land that still have outstanding Citizen Concern or objections. Citizen Workshops, when done right, are valuable means to openly educate, discuss and work to consensus options. These areas, including Ponto, were/are subject to multiple lawsuits, so true open and honest public workshops would provide an opportunity to openly and honestly discuss the issues and hopefully build public consensus/support for solutions. This approach seems consistent with CCA Section 30006, and common sense.
  - Extend the public comment period 6-months to allow Citizen Review of the Redline Version of the LCPA and allow time for Citizen Workshops.

The City did extend the Public Review period 2-months over the holidays to January 31, 2020. This is appreciated although many think this is inadequate given the significance of the Proposed Land Use Plan Amendments, and lack of Redline Version to compare. The City and their consultants required several extra years beyond schedule prepare the proposed LCP Amendments. The extra years of City Staff work reflects on the volume of the over 500-pages in the documents and the time needed to understand the Existing LCP and then create an Amended LCP. Citizens need sufficient time, proper comparative tools (redline) and a process (workshops) to understand the proposed LCP Amendments that is reflective of extensive extra time needed by City Staff and consultants needed. Truncation of lay public review to a few months for an Amendment that took paid professionals many years to produce seems a more than a bit inappropriate. The City appears to be rejecting citizens' request to be provided a 'Redline Version' of the Existing 2016/Proposed LCP land use Plan. So public review comments will tainted or will miss many issues due having to manually cross-reference a 150-page Existing LCP LUP with a Proposed 350-page Proposed LCP LUP. There will be unknown and unconsidered changes in the Draft LCP Amendment that the public and city and CCC decision makers will not know about due to the lack of 'Redline Version'.

The City also appears to reject citizen requests for true Citizen Workshops on the major remaining vacant Coastal land that still have outstanding Citizen Concern – such as Ponto. Like Coastal Recreation issue #1 above the following citizen requests appear consistent with CA Coastal Act (CCA) Section 30006, and the City's rejection of that requests seem counter to the CA Coastal Act.

We again request of the City to provide: 1) a 'Redline Version' to the public and decision makers, along with sufficient time to review and comment on the 'Redline Version'; and 2) true Citizen Workshops for Ponto and the

other last remaining significant vacant Coastal lands in Carlsbad as part of the Draft LCP Amendment process, or as part of deferred LCP Amendment process for those areas.

4. Coastal Zoned land is precious: the very small amount of remaining vacant Coastal land should be reserved for “High-Priority” Coastal Recreation Land Uses under the CA Coastal Act to provide for the growing and forever ‘Buildout’ needs of Carlsbad and CA Citizens, and our visitors.
  - Less than 1.8% (76 square miles) of San Diego County’s 4,207 square miles is in Coastal Zone. This small area needs to provide for all the forever Coastal needs of the County, State of CA, and Visitors. Upland Coastal Recreation (Coastal Park) land use is needed to provide land to migrate the projected/planned loss of “High-Priority” Coastal Recreation land uses due to Sea Level Rise impacts. There is only 76 miles of total coastline in San Diego County; a significant amount is publicly inaccessible military/industrial land. So how the last few portions of Coastal Land within Carlsbad (which is about 8% of San Diego County’s Coastline) is planned for the forever needs for High-Coastal-Priority Recreation Land Use is critical for Carlsbad, San Diego, and California Statewide needs into the future.
  - Most all the developable Coastal land in Carlsbad is already developed with Low-Coastal-Priority residential uses. Only a very small percentage of Carlsbad’s developable Coastal land, maybe 1-2%, is still vacant. This last tiny portion of fragment of vacant developable Coastal Land should be documented in the Draft LCP and reserved for “High-Priority” Coastal Land uses – most critically Coastal Recreation – to address the growing Coastal Recreation needs from a growing population and visitors. These growing needs are all the more critical in that existing Coastal Recreation lands will be decreasing due to inundation and erosion due to DLCPA planned Sea Level Rise.
  - This image of the western half of San Diego County graphically shows (in the blue line) the very small Coastal Zone Area that needs to provide the Carlsbad’s and California’s Coastal Recreational needs for all San Diego County residents and Visitors:



We request that 1) the amount and location of remaining vacant Coastal land in Carlsbad be documented and mapped and be reserved for high-priority Coastal Land Uses consistent with CCA Goals in Section 30001.5 “... (c) ... **maximize public recreational opportunities in the coastal zone** consistent with sound resources conservation principles and constitutionally protected rights of private property owners. (d) **Assure priority for coastal-dependent and coastal-related development over other development on the coast.** ...”; 2). This data be used in the City’s analysis and the public’s review and discussion about the City’s proposed Draft ‘Buildout’ Land Use Plan. The City’s proposed Draft ‘Buildout’ Land Use Plan will forever lock in the amount “maximum public recreational opportunities in the coastal zone” and will be the final Coastal Land Use Plan that is supposed to “assure priority for coastal-dependent and coastal-related development over other development on the coast”. Most of Carlsbad’s Coastal Zone is already developed or committed to low-priority land uses contrary to these CCA Goals, so how we finally and forever plan to use of the last small remaining vacant Coastal Land is very important.

5. The proposed Draft LCP Amendment in Chapter 3 makes unfounded statements regarding the proposed Amendment to the LCP Land Use Plan provision of “High-Priority” Coastal Recreation land use: On page 3-3, at the beginning of the Chapter 3 – Recreation and Visitor Serving Uses the City correctly states that the CA Coastal Act (CCA) places a high priority on maximizing Recreation uses, and cites multiple CCA Sections to that effect. The City’s proposed Coastal Land Use Plan then states on page 3-5 that a high proportion of land in the City is dedicated open



space available for passive and active use, yet provides no justification or accurate metric to support this statement. This is a critical unsubstantiated and speculative statement that is not supported by any comparative data (justifying the “high proportion” statement). The City later in Chapter 3 compared the adjoining cities of Oceanside and Encinitas to try to show how the proposed Draft LCP LUP Amendment provides higher levels of Visitor Serving Accommodations. That ‘non-common denominator’ comparison was fundamentally flawed, as noted in a prior separate Draft LCPA public review comment from People for Ponto regarding another high-priority Coastal land use (visitor accommodations) planned for in Chapter 3, but at least it was an attempt to compare. However, for the Coastal Recreation portion of Chapter 3, the City does not even attempt to provide any comparative data to support (or justify) the proposed Coastal Recreation Land Use Plan and statements. The Coastal Recreation Chapter also fails to disclose Carlsbad’s adopted City Park Master Plan (Park Service Area and Equity map) data that shows a clear conflict between the CA Coastal Act Policy Sections noted at the beginning of Chapter 3 and Chapter 3’s proposed Draft Coastal Recreation Land Use Plan.

Comparative Coastal Recreation: Comparing the Land Use Plan and policies of Oceanside, Carlsbad and Encinitas, one finds Carlsbad’s proposed Coastal Recreational Plan and Policies are not “high”, but very low compared with Oceanside and Encinitas. Carlsbad has a General Plan Park Standard of 3 acres of City Park per 1,000 Population. Oceanside has a 5 acres of City Park Standard per 1,000 population, and Encinitas has a 15 acres per 1,000 population standard, and an in-lieu park fee requirement of 5 acres per 1,000 population. Carlsbad’s proposed Coastal Recreation Land Use Plan is in fact not ‘high’ but is in fact the lowest of the three cities, with Carlsbad providing only 40% of Oceanside’s park standard, and only 20% of Encinitas’s Park Standard. Citywide Carlsbad currently has 2.47 acres of developed park per 1,000 population, Oceanside currently has 3.6 acres of developed park per 1,000 population, and Encinitas currently has 5.5 acres of developed park per 1,000 population. Although this data is citywide, it shows Carlsbad’s current amount of developed parkland is less than 70% of what Oceanside currently provides, and less than 45% of what Encinitas currently provides. Carlsbad is not currently providing, nor proposing a Coastal Land Use Plan to provide, a ‘high’ proportion of Coastal Recreation Land Use compared to Oceanside and Encinitas.

On page 3-5 Carlsbad may be misrepresenting city open space that is needed and used for the preservation of federally endangered species habitats and lagoon water bodies. This open space Land cannot be Used for Coastal Recreation purposes; and in fact Land Use regulations prohibit public access and Recreational Use on these Lands and water bodies to protect those endangered land and water habitats. 78% of Carlsbad’s open space is “open space for the preservation of natural resources” and cannot be used for Coastal Parks and Recreational use. Although “open space for the preservation of natural resources” does provide scenic or visual amenity, and this amenity is addressed as a different coastal resource. Visual open space is not Coastal Recreation Land Use. It appears Carlsbad is proposing in the Draft LCP Amendment to continue to, providing a ‘low’ percentage of Coastal Park Land Use and Coastal Recreation Land Use compared to adjoining cities.

In addition to the comparatively low amount of Coastal Park land Carlsbad plans for, Carlsbad scores very poorly regarding the equitable and fair distribution and accessibility of Coastal Parks and Coastal Recreation Land Uses. Both the City of Oceanside and Encinitas have very robust and detailed Park and Land Use plans to promote an equitable distribution of, and good non-vehicular accessibility, to their Coastal Parks. By comparison, Carlsbad’s park land use plan scores poorly, as exemplified in Ponto and South Carlsbad. Ponto’s existing population requires about 6.6 acres of City Parkland per Carlsbad’s low 3 acres per 1,000 population standard. Yet the nearest City Park is several miles away and takes over 50 minutes to walk along major arterial roadways and across Interstate 5 to access. As such this nearest park is not an accessible park for Ponto children, and thus Ponto children have to play in



however it more accurately illustrated in the following data/image from the adopted Carlsbad Park Master Plan's "Service Area Maps (Equity Maps)". The image below titled 'No Coastal Park in South Carlsbad' shows Carlsbad's adopted "Park Service Area Maps (Equity Maps)" from the City's Park Master Plan that says it maps "the population being served by that park type/facility." The added text to the image is data regarding park inequity and disparity in South Carlsbad. The image compiles Carlsbad's adopted Park "Park Service Area Maps (Equity Maps)" for Community Parks and Special Use Area Parks that are the City's two park acreage types produced by the City's comparatively low standard of 3 acre of City Park per 1,000 population. The City's Park Service Area Maps (Equity Maps) shows areas and populations served by parks within the blue and red circles. City data clearly shows large areas of overlapping Park Service (areas/populations served by multiple parks) in North Carlsbad and also shows large areas in South Carlsbad with No Park Service (areas/populations unserved by any parks) and Park Inequity in South Carlsbad. It clearly shows the City's Documented Park Need and Park inequity at Ponto. The Existing LCP LUP for Ponto's Planning Area F in is required to "consider" and "document" the need for a "Public Park". The City's adopted Park Service Area Maps (Equity Maps) clearly shows the inequity of Coastal City Park between North and South Carlsbad, and the need for Coastal Parks in South Carlsbad – particularly at Ponto. The City's proposed Draft 'Buildout' Coastal Recreation Land Use Plan instead proposes to lock-in documented City Public Coastal Park inequity and unserved Coastal Park demand at Ponto and South Carlsbad forever. It does so by proposing the last vacant undeveloped/unplanned Coastal land – Ponto Planning Area F - in the unserved Ponto and South Carlsbad coastline areas instead of being planned for much needed City Park and Coastal Recreation use be converted to even more low-priority residential and general commercial land uses. These 'low-priority' residential uses, by the way, further increase City Park and Coastal Recreation demand and inequity in Coastal South Carlsbad. This is wrong, and a proposed 'forever-buildout' wrong at the most basic and fundamental levels. The proposed Draft Coastal Recreation Land Use Plan by NOT providing documented needed City parks for vast areas of Coastal South Carlsbad is inconsistent with the CA Coastal Act policies and Existing LCP LUP requirements for Ponto Planning Area F; and also inconsistent with fair/equitable/commonsense land use and park planning principles, inconsistent with CA Coastal Commission social justice goals, inconsistent with social equity, inconsistent with VMT reduction requirements, and inconsistent with common fairness. A different Coastal Recreation Land Use Plan should be provided that provides for a socially equitable distribution of Coastal Park resources so as to would allow children, the elderly and those without cars to access Coastal Parks. The proposed Draft 'Buildout' Coastal Recreation Land Use Plan forever locking in the unfair distribution of City Parks appears a violation of the not only CCA Sections 30213, 30222, 30223, and 30252(6) but also the fundamental values and principles of the CA Coastal Act. The Draft also appears a violation of Carlsbad's Community Vision.



## No Coastal Park in South Carlsbad

- Appx. 6 miles of Coast without a Coastal Park is a City & Regional need
- South Carlsbad has 64,000 residents & thousands of hotel visitors without a Coastal park
- Closest park to Ponto is Poinsettia Park, approx. 2.5 miles across I-5
- Proposed Veterans Park is approx. 6 miles away



A different Coastal Recreation Land Use Plan is required to provide a more equitable distribution of City Parks with non-vehicular accessibility. Such a different plan would advance State and City requirements to reduce vehicle Miles Traveled (VMT) and greenhouse gas emissions that contribute to climate change and sea level rise impacts. Please note that the data for the above basic comparison comes from City of Carlsbad, Oceanside and Encinitas General Plan and Park Master Plan documents.

Data shows the proposed Coastal Recreation Plan conflicts with the CA Coastal Act policy Sections. As mentioned page 3-3 correctly states that the CA Coastal Act (CCA) places a high priority on maximizing Recreation Land Uses, and pages 3-5 list multiple CA Coastal Act (CCA) policy Sections that confirm this. However, given the significant statewide importance of Coastal Recreation Land Use, the City proposed 'Buildout' Coastal Recreation Land Use Plan does not appear to adequately address and implement these CCA Policies, and most noticeably in the Ponto area of South Carlsbad. Coastal Recreation is a significant Statewide High-Priority Land Use under the CCA. For a substantially developed non-coastal-industry city like Carlsbad Coastal Recreation is likely the biggest land use issue. This issue is even more elevated due to the fact that there are only a few small areas left of undeveloped Coastal land on which to provide Coastal Recreation, and Carlsbad is proposing a Coastal 'Buildout' Land Use Plan on those areas. The use of the last few remaining vacant portions of Coastal land for Coastal Recreation Land Use is the most important land use consideration in the proposed Draft LCP Land Use Plan Amendment as population and visitor growth will increase demands for Coastal Recreation. It is thus very surprising, and disturbing that the proposed Coastal Recreation Land Use Plan is so short, lacks any comparative and demand projection data, lacks any resource demand/distribution and social equity data, and lacks any rational and clear connection with CCA Policy and the proposed 'Buildout' Coastal Land Use plan. This is all the more troubling given that:

- The Ponto area represents the last significant vacant undeveloped/unplanned land near the coast in South Carlsbad that can provide a meaningful Coastal Park.
- The fact that the City's Existing LCP requires the city consider and document the need for a "i.e. Public Park" on Ponto's Planning Area F prior to the City proposing a change of Planning Area F's "Non-residential

Reserve” land use designation. The City has repeatedly failed to comply with this LCP LUP requirement, and worse has repeatedly failed to honestly inform citizens of this LCP LUP requirement at planning Area F before it granted any land use. The City, apparently implementing speculative developer wishes, has repeatedly proposed changing Planning Area F’s Coastal Land Use designation to “low-priority” residential and general commercial land uses without publically disclosing and following the Existing LCP LUP.

- The City’s currently developed parks in the southern portion of the City do not meet the city’s comparatively low public park standard of only 3 acres per 1,000 population. Since 2012 there has been City park acreage shortfall in both SW and SE Carlsbad.
- The Existing population of Ponto (west of I-5 and south of Poinsettia Lane) requires about 6.6 acres of Public Park based on the City’s comparatively low public park standard of 3 acres per 1,000 population. There is no Public Park in Ponto. Adding more population at Ponto will increase this current park demand/supply disparity.
- Carlsbad and other citizens have since 2017 expressed to the City the strong need for a Coastal Park at Ponto, and requested the City to provide a true citizen-based planning process to consider the Public Park need at Ponto. The Citizens’ requested process is fully in-line with CCA Goals, Public Participation Policy, Land Use Policies, and the Existing LCP Land Use Plan/requirements for Planning Area F and is the most appropriate means to consider and document the need for a Public Park at Ponto as required by the Existing LCP Land Use Plan.
- Planning Area F is for sale, and a non-profit citizens group has made an offer to purchase Planning Area F for a much needed Coastal Park for both Ponto and inland South Carlsbad residents and visitors. How should these facts be considered by the City and CCC?
- Carlsbad has no Coastal Parks west of I-5 and the railroad corridor for the entire southern half of Carlsbad’s 7-mile coastline.
- The southern half of Carlsbad’s coastline is 5.7% of the entire San Diego County coastline and represents a significant portion of regional coastline without a meaningful Coastal Park west of I-5 and the Railroad corridor.
- The City’s proposed Coastal Recreation Land Use Plan provides No Documentation, No Rational, and No Supporting or Comparative Data to show the proposed Coastal Recreation Land Use Plan in fact complies with the CA Coastal Act.

6. There is no Coastal Recreation/Park west of interstate 5 for all South Carlsbad, or half of the entire City. This is an obviously unfair and inequitable distribution of Coastal Recreation/Park resources that should be corrected by changes to the Draft LCP Land Use Amendment: The following image (which was sent to the City and CCC on several prior communications) was first requested by former Carlsbad Councilman Michael Schumacher during a People for Ponto presentation/request at the Oct 23, 2018 City Council meeting. The data compiled in the image shows how the South Coastal Carlsbad (Ponto) is not served by a Park per the City’s adopted Parks Master Plan. The blue dots on the map are park locations and blue circle(s) show the City’s Park Master Plan adopted Park Service Areas and Park Equity. This data, from pages 87-88 of the City of Carlsbad Parks Master Plan, shows all City Parks (both Community Parks and Special Use Areas in Coastal Carlsbad (except Aviara Park east of Poinsettia Park and west of Alga Norte Park). The text on the left margin identifies the South Carlsbad Coastal Park (west of I-5) gap along with the number of South Carlsbad Citizens (over half the City’s population) without a Coastal Park. The left margin also identifies more local issues for the over 2,000 Ponto area adults and children. For Ponto residents the nearest Public Park and City proposed ‘solution’ to the South Carlsbad and Ponto Public Park deficit are miles away over high-speed/traffic roadways and thus somewhat hazardous to access and effectively unusable by children/the elderly or

those without cars. Having been a 20-year resident of Ponto I regularly see our children have to play in the street as there are no Public Park with large open fields to play at within a safe and under 1-hour walk away. Ponto citizens have submitted public comments regarding this condition and the lack of a Park at Ponto

## No Coastal Park in South Carlsbad

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- Proposed Veterans Park is approx. 6 miles away



Ponto is at the center of regional 6-mile Coastal Park Gap. A Coastal Park in this instance being a Public Park with practical green play space and a reasonable connection with the Coast (i.e. located west of the regional rail and Interstate-5 corridors). The following image shows this larger regional Coastal Park Gap centered on the Ponto Area, and the nearest Coastal Parks – Cannon Park to the north, and Moonlight Park to the south.

Regionally this image shows Ponto is the last remaining significant vacant Coastal land that could accommodate a Coastal Park to serve the Coastal Park current needs of over existing 2,000 Ponto residents, 64,000 existing South Carlsbad residents, and a larger regional population. It is also the only area to serve the Coastal Park needs for the thousands of hotel rooms in Upland Visitor Accommodations in South Carlsbad.

# How Ponto Serves Region

- Ponto is in the middle of the regional Coastal Park Gap
- A Ponto Coastal Park fills a critical 6 mile gap of coastline without a Coastal Park - 8.6% of SD County coastline
- A Ponto Coastal Park Serves over 26,000 homes & 64,000 citizens just in South Carlsbad without a Coastal Park
- Serves many more people outside Carlsbad



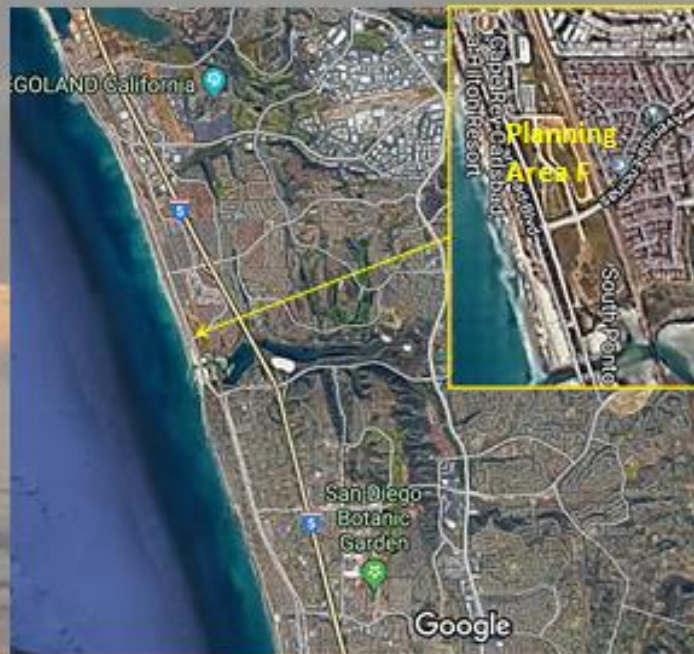
As People for Ponto first uncovered and then communicated in 2017 to the City and CCC; Carlsbad's Existing (since 1994) Local Coastal Program LUP currently states (on page 101) that Ponto's Planning Area F: carries a Non-Residential Reserve (NRR) General Plan designation. Carlsbad's Existing Local Coastal Program Land Use Plan states: "Planning Area F carries a Non-Residential Reserve (NRR) General Plan designation. Planning Area F is an "unplanned" area ..." and requires that: "... **As part of any future planning effort, the City and Developer must consider and document the need for the provision of lower cost visitor accommodations or recreational facilities (i.e. public park) on the west side of the railroad.**" CA Coastal Commission actions, Carlsbad Public Records Requests 2017-260, 261, and 262, and 11/20/19 City Planner statements confirm the City never fully communicated to Carlsbad Citizens the existence of this LCP requirement nor did the City comply with the requirements. Of deep concern is that the City is now (as several times in the past) still not honestly disclosing to citizens and implementing this Existing LCP requirement as a true and authentic 'planning effort'. The lack of open public disclosure and apparent fear of true public workshops and Public Comment about the Existing Planning Area F LCP requirements are troubling. The point of a 'planning effort' is to openly and publically present data, publically discuss and explore possibilities/opportunities, and help build consensus on the best planning options. Citizens are concerned the city has already made up its mind and there is no real "planning effort" in the proposed Draft LCP Amendment process, just a brief Staff Report and at the end provide citizens 3-minutes to comment on the proposal. This is not the proper way to treat the last remaining significant vacant land in South Carlsbad that will forever determine the Coastal Recreation environment for generations of Carlsbad and California citizens and visitors to come.

The following data/images show how Ponto is in the center of the 6-mile (west of I-5 and Railroad corridor) regional Coastal Park gap. Ponto is the last remaining vacant and currently "unplanned" Coastal land that is available to address this regional Coastal Park Gap.



## How Ponto Serves Region cont.

- **Relieves Coastal Park congestion** in North Carlsbad, Encinitas and Solana Beach
- Area currently needs Coastal Park as seen by:
  - Ponto Beach parking congestion
  - current trespass use of Planning Area F as a Park
- **6.6 acre portion of Planning Area F** addresses SW Quad City Park deficit



## How Ponto Serves Region cont.

- A Ponto Park helps address 2050 and beyond Regional Population and Visitor Growth demands for Coastal Parks
- A Ponto Park provides the lowest-cost coastal access and recreation opportunities for CA citizens and visitors





## How Ponto Serves Region cont.

- Vital park and open space amenity for Visitor serving businesses and accommodations
- 6.6 acre unique City Coastal Park venue to stage special events: Runs, bike rides, triathlons, sports, coastal festivals, etc.



## How Ponto Serves Region cont.

- Critical Park space for So. Carlsbad State Beach Campground
- Provides a big training and staging space for Junior lifeguards
- Dog walk trail



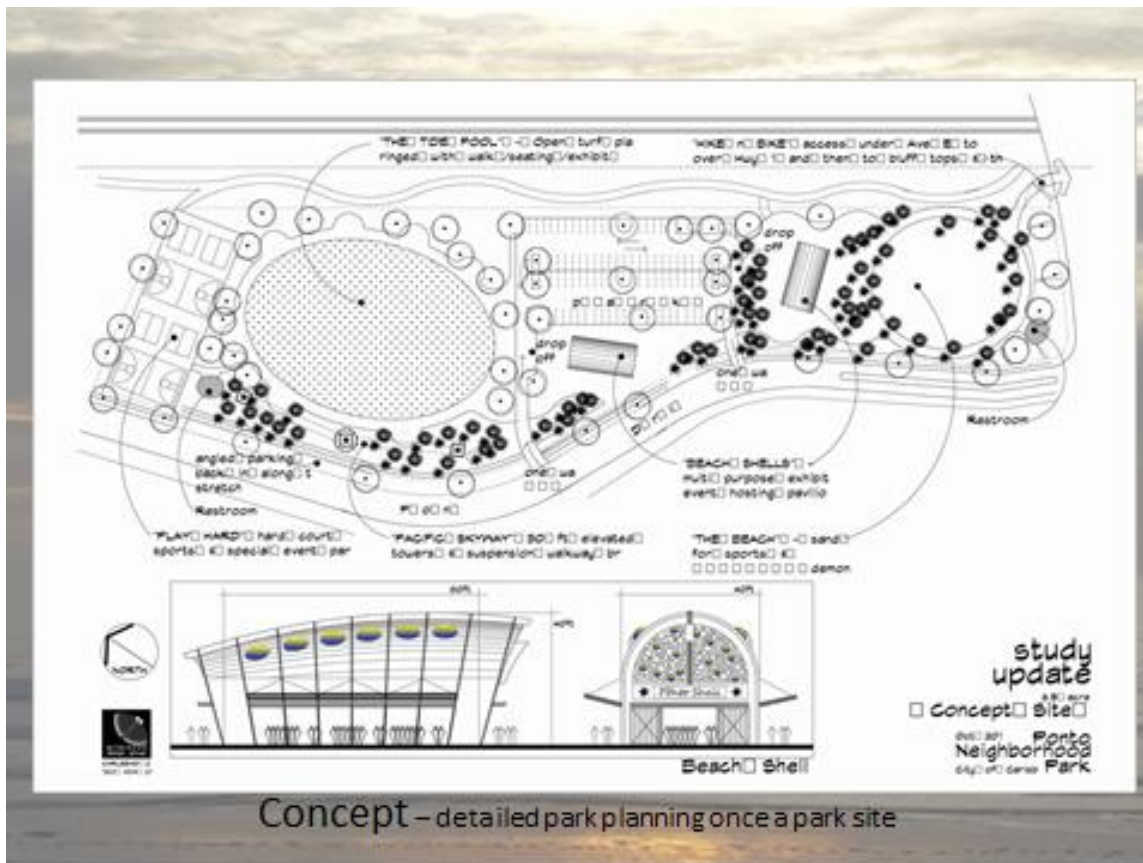
# Ponto Coastal Park Concept

- A concept – but shows potential recreational opportunities
- Provides **vital parkland support for beach & open play fields**
- Concept plan a gift from San Pacifico Community Association



One possible Concept image of a potential Ponto Coastal Park at Planning Area F is illustrated below. The potential for a Ponto Coastal Park is real. The speculative land investment fund (Lone Star Fund #5 USA L.P. and Bermuda L.P.) that currently owns Planning Area F is selling the property, and is available for the City of Carlsbad to acquire to address the documented demand/need for a City Park and City Park inequity at Ponto and in Coastal South Carlsbad. A Ponto Beachfront Park 501c3 is working to acquire donations to help purchase the site for a Park. These situations and opportunities should be publicly discussed as part of the City Staff's proposed Local Coastal Program Land Use Plan Amendment.





7. Projected increases in California, San Diego County and Carlsbad population and visitor growth increases the demand for High-Priority-Coastal Recreation land use:
  - Increasing Citizen demand for Coastal Recreational land needs to be addressed with increased Coastal Recreation land:

San Diego County Citizen Population - Source: SANDAG Preliminary 2050 Regional Growth Forecast

1980	1,861,846
1990	2,498,016
2000	2,813,833
2010	3,095,313
2020	3,535,000 = 46,500 Citizens per mile of San Diego County coastline
2030	3,870,000
2040	4,163,688
2050	4,384,867 = 57,700 Citizens per mile of San Diego County coastline

2020 to 2050 = 24% increase in San Diego County population.

Citizen Population will continue beyond 2050. Carlsbad may plan for 'Buildout' in 2050, but what is San Diego County's 'Buildout'? There is a common-sense need to increase the amount of Coastal Recreation Land Use in the Proposed LCP Amendment to the Land Use Plan for this growing population. If we do not increase our supply of Coastal Recreational Resources for these increased demands our Coastal Recreation Resources will become more overcrowded, deteriorated and ultimately diminish the Coastal Recreation quality of life for Citizens of Carlsbad and California. Ponto sits in the middle of an existing 6-mile regional Coastal Park Gap (no Coastal Park west of Interstate 5) and there is No Coastal Park in all of South Carlsbad to address the Coastal Recreation needs of the 64,000 South Carlsbad Citizens.



- Increasing Visitor demand for Coastal Recreational land needs to be addressed with increased Coastal Recreation land:

Yearly Visitors to San Diego County – source: *San Diego Tourism Authority; San Diego Travel Forecast, Dec, 2017*

2016	34,900,000
2017	34,900,000
2018	35,300,000
2019	35,900,000
2020	36,500,000 = average 100,000 visitors per day, or 2.83% of County's Population per day, or 1,316 Visitors/coastal mile/day in 2020
2021	37,100,000
2022	37,700,000

This is growth at about a 1.6% per year increase in visitors. Projecting this Visitor growth rate from 2020 to 2050 results in a 61% or 22,265,000 increase in Visitors in 2050 to:

2050	58,765,000 = average 161,000 visitors per day, or 3.67% of the County's projected 2050 Population per day, or 2,120 Visitors/coastal mile/day in 2050.
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The number of Visitors is likely to increase beyond the year 2050. There is a common-sense need to increase the amount of Coastal Recreation Land Use in the Proposed LCP Amendment to the Land Use Plan for these projected 2050 61% increase, and beyond 2050, increases in Visitor demand for Coastal Recreational Resources. Increasing Coastal Recreation land is a vital and critically supporting Land Use and vital amenity for California's, the San Diego Region's and Carlsbad's Visitor Serving Industry. Ponto sits in the middle of an existing 6-mile regional Coastal Park Gap (no Coastal Park west of Interstate 5). There are thousands of hotel rooms in South Carlsbad that have NO Coastal Park to go to in South Carlsbad. This needs correcting as both a Coastal Act and also a City economic sustainability imperative.

- We request that the as part of the public's review, the City Staff proposed Draft LCP Amendment to the Land Use Plan clearly document if and/or how future forever 'Buildout' City, Regional and Statewide population and visitor population demand for Coastal Recreation and City Coastal Parks are adequately provided for both in amount and locational distribution in the Carlsbad proposed Amendment of the LCP Land Use Plan.

8. Carlsbad's Draft Local Coastal Program Land Use Plan Amendment says it plans to a year 2050 buildout of the Coastal Zone. The Draft Local Coastal Program Land Use Plan Amendment then is the last opportunity to create a Coastal Land Use Plan to provide "High-Priority" Coastal Recreation Land Use, and will forever impact future generations of California, San Diego County, and Carlsbad Citizens and Visitors:

- The Draft LCPA indicates in 2008 only 9% of All Carlsbad was vacant land. Less is vacant now in 2019. Carlsbad's Coastal Zone is 37% of the City, so vacant unconstrained land suitable for providing Coastal Recreation is likely only 3-4%. The prior request for a full documentation of the remaining vacant Coastal lands will provide a better understanding needed to begin to make the final 'buildout' Coastal Land Use Plan for Carlsbad. The Draft LCPA does not indicate the amount and locations of currently vacant unconstrained Coastal Land in Carlsbad. This final limited vacant land resource should be clearly documented and mapped in the DLCPA as it represents the real focus of the DLCPA – the Coastal Plan for these remaining undeveloped

lands. These last remaining vacant lands should be primarily used to provide for and equitably distribute “High-Priority” Coastal Recreation Land Uses consistent with CCA Sections:

- i. Section 30212.5 “... Wherever appropriate and feasible, public facilities, including parking areas or facilities, **shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.**”;
- ii. Section 30213 “... **Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred. ...**”;
- iii. Section 30222 “**The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development,** but not over agriculture or coastal-dependent industry.”
- iv. Section 30223 “**Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible**” ,
- v. Section 30251 ... The location and amount of new development should maintain and enhance public access to the coast by ... 6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by **correlating the amount of development with local park acquisition** and development plans with the provision of onsite recreational facilities to serve the new development”

Adopted City Park Service Area and Park Equity maps discussed earlier document the proposed Draft LCP Amendment’s inconstancy with the above CCA Policy Sections. The locations and small amounts remaining vacant Coastal lands provide the last opportunities to correct the inconsistencies of City proposed Draft “buildout” LCP Land Use Plan Amendment with these Coastal Act Policies.

Currently and since 1996 there has been LCP LUP Policy/regulations for Ponto Planning Area F that require consideration of a “Public Park” prior to changing the existing “unplanned Non-residential Reserve” Land Use designation. A map and data base of vacant developable Coastal land should be provided as part of the Draft LCPA and the Draft LCPA. This map and data base should document the projected/planned loss of Coastal land use due to Sea Level Rise. Draft LCPA projects Sea Level Rise will eliminate several beaches and High-Priority Coastal Land Uses like Coastal Lagoon Trails and the Campground.

- The LCP Land Use Plan should plan and reserve the very limited vacant developable Coastal land for the long-term ‘Buildout’ needs of “High-Priority” Coastal Recreation Land Use. Vacant developable Coastal land is too scarce to be squandered for “low-priority” uses. Sea Level Rise will reduce “High-Priority” Coastal Uses. So how vacant developable Upland area should be preserved for “High-Priority” Coastal Uses is a key requirement to be fully documented and discussed in the Draft LCPA. If not one of two things will eventually happen 1) any new Coastal Park land will require very expensive purchase and demolition of buildings or public facilities to create any new Coastal Park land to meet existing and growing demand; or 2) Coastal Recreation will be hemmed-in by “low-priority” uses and thus force Coastal Recreation to decrease and become increasingly concentrated and overcrowded in its current locations; and thus will promote the eventual deterioration of our current Coastal Recreation resources. A plan that fails to fix Coastal Park deficits and then increase Coastal Parks in pace with increased population/visitor demand is a plan that can

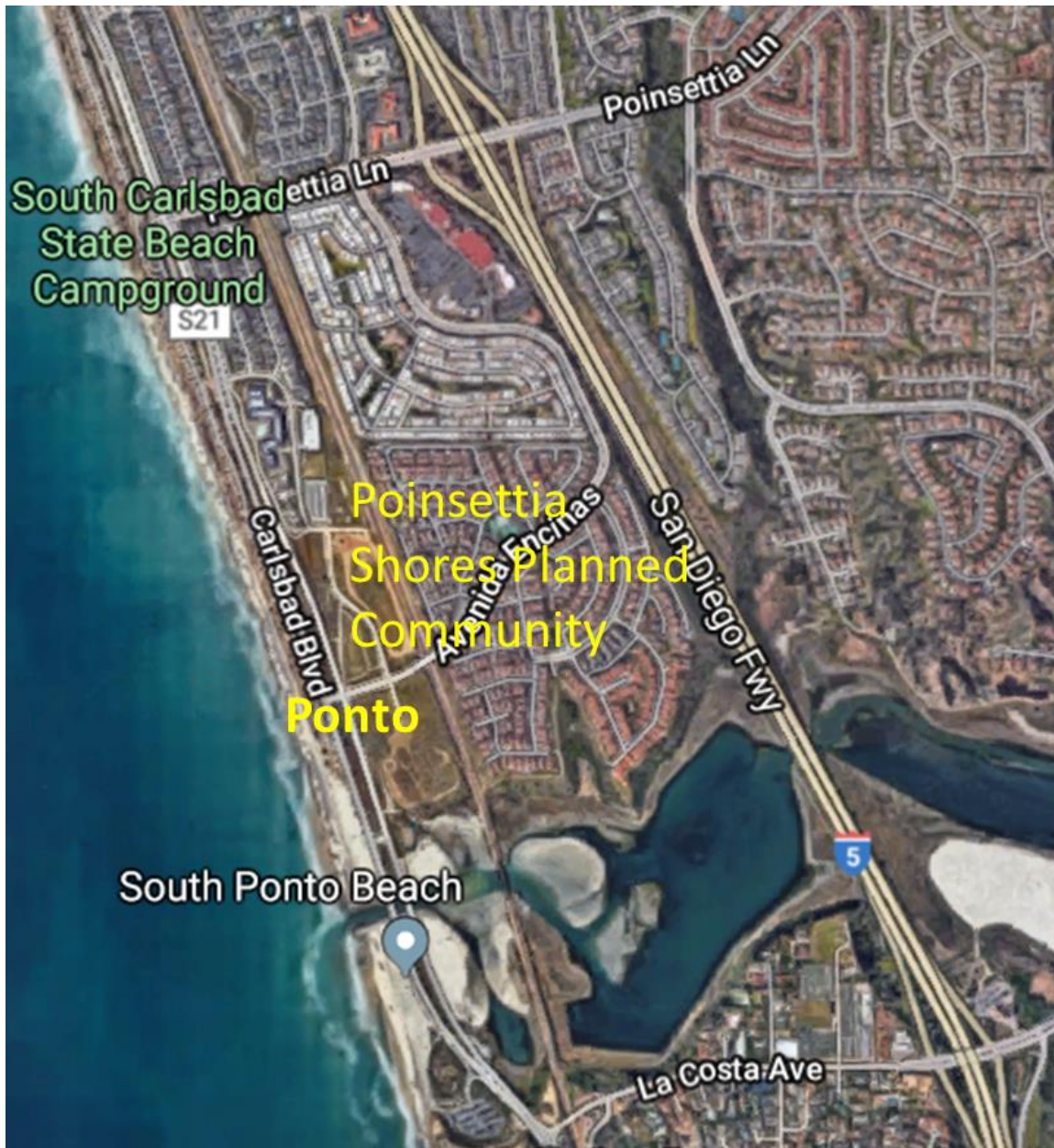
only result in degradation. How the Draft LCPA documents and addresses the land use planning of the last small portions of vacant developable Coastal land is critical for the future and future generations.

9. Citizens of South Carlsbad are concerned about the City's multiple prior flawed Ponto planning processes or 'mistakes' the City has made yet is basing the City Staff's proposed Draft LCP LUP. The concerns being the City is not openly and honestly communicating information to citizens and the public, and not allowing a reasonable and appropriate community-based planning process to address the documented Park, Coastal Recreation and unconstrained open space needs in South Carlsbad. One of these groups of citizens has created a [www.peopleforponto.com](http://www.peopleforponto.com) website to try to research and compile information and hopefully provide a better means for citizens to understand facts and then express their concerns/desires to the City of Carlsbad (City) and CA Coastal Commission (CCC). Over 2,000 emails have sent to the City and CCC regarding Coastal Land Use Planning Issues at Ponto. The San Pacifico Planned Community (i.e. San Pacifico Community Association) has also, since 2015, sent numerous emailed letters to the City and CCC noting the significant concerns about changes in Coastal planning the City is proposing for our Planned Community.

Repeatedly over 90% of surveyed citizens (results emailed prior to both the City and CCC) have expressed the vital need and desire for a Coastal Park at Ponto to serve the current and future Coastal Recreation needs for all both Ponto and South Carlsbad and for larger regional and State Coastal Recreational needs. This desire is supported by data, CA Coastal Act Policy, and also Carlsbad's Community Vision – the foundation for the City's General Plan. Ponto is the last remaining vacant Coastal area available to provide for those needs in South Carlsbad and for a regional 6-mile stretch of coastline. Citizens have expressed deep concern about the City's flawed prior Coastal planning efforts for Coastal Recreation at Ponto, including two repeated LCP Amendment "mistakes" (Ponto Beachfront Village Vision Plan in 2010 and General Plan Update in 2015) when the City twice failed to publicly disclose/discuss and then follow the Existing LCP requirements at Ponto – specifically for Planning Area F. People for Ponto had to use multiple Carlsbad Public Records Requests in 2017 to find these "mistakes". CCC Staff was helpful in both confirming the City "mistakes" and communicating back to the City. As citizens we are still unclear as to how/why these two repeated "mistakes" happened. There is citizen concern that the City is again repeating these two prior "mistakes" by not at the beginning of the Public Comment Period clearly and publicly disclosing the Planning Area F LCP requirements to citizens as part of the current LCP Amendment process, and also by not implementing the existing LCP requirement PRIOR to proposing an Amended Coastal Land Use Plan for Ponto. The City in its proposed LCP Amendment process is putting-the-cart-before-the-horse with respect to honest and open consideration, documentation and public discussion of the need for high-priority Coastal Recreation land use required of Planning Area F at Ponto. The City is also not clearly letting all Carlsbad citizens know about the Existing LCP requirements for Ponto's Planning Area F so they can be informed to reasonably participate in public review and comment regarding amending that LCP requirement, and the need for Coastal Recreation land uses in South Carlsbad. Since 2017 there has been repeated citizen requests to the City (copies were provided to the CCC) to fix these multiple fundamental/foundational flaws by in the City's prior Coastal Recreation and Public Parks and Open Space at planning, and the currently Proposed Draft LCP Land Use Plan Amendment. Since 2017 there have also been repeated citizen requests to the City to provide a truly open, honest, inclusive community-based planning process and workshops with the accurate and honest information, prior to forming a proposed Draft LCP Land Use Plan Amendment. As citizens we believe we can constructively work with the City and CCC towards a consensus or viable options on these important Coastal Recreation issues if the City allows and encourages such an open, honest and inclusive process. We request the City respond to the requests submitted to the City since 2017, and again request such a process from the City before any LCP Amendment is first considered by the Planning Commission and City Council. Such a requested process benefits all.

10. Why the Draft LCPA Land Use Plan for Ponto should provide for the current and future Coastal Park and Recreation needs for South Carlsbad, the San Diego Region and California.

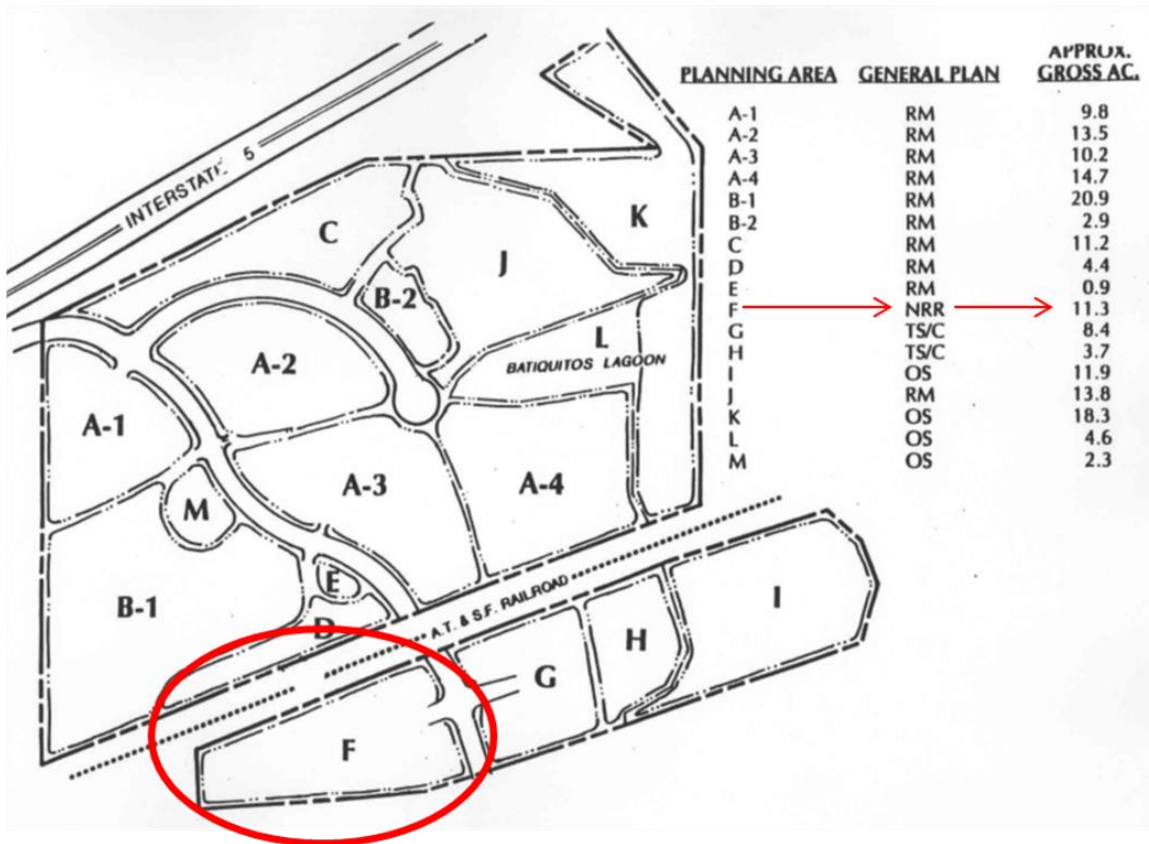
- Ponto, is one of last remaining vacant and undeveloped Coastal lands in North County
- Ponto is the last remaining undeveloped Coastal land in South Carlsbad
- Ponto has the last unplanned Planning Area of the Existing Poinsettia Shores Planned Community & Local Coastal Program that can be planned for high-priority Coastal Recreation land use. This Existing LCP requires Planning Area F be considered for a “Public Park”.
- Following is a map of the Ponto area in South Carlsbad:



Following is the LCP Land Use map from the Existing Poinsettia Shores Master Plan & Local Coastal Program adopted in 1996. This is the Land Use map that the City is proposing to change in the proposed LCP Amendment to the Land Use Plan. As the Existing LCP Land Use map shows most all the land is ‘low-priority’ residential use at an RM Residential medium density, a small portion is ‘high-priority’ Visitor Serving TC/C Tourist Commercial. Most all the



Open Space is constrained and undevelopable land (the steep CSS habitat bluffs above Batiquitos Lagoon) or water (the lagoon water). This land/water is owned by the State of California, like the inner lagoon east of I-5. Only Planning Area M at 2.3 acres is unconstrained Open Space and it provides a small private internal recreation facility for the approximately 450 homes and 1,000 people in the Planned Community. This small recreation area is a City requirement for ‘planned developments’ to off-set loss open space from planned development impacts on housing quality. Planned developments can propose designs that reduce normal setback and open space areas – they bunch together buildings to increase development – such as the smaller lot sizes, and extensive use of “zero-setbacks” to reduce typical lot sizes that occurs at Poinsettia Shores. A private recreation facility in any of the City’s planned developments is never considered a replacement for required City Parks. Planned Developments, like unplanned developments, are required to dedicate Park land to the City, or pay a Park In-Lieu fee to the City so the City provide the developer’s obligation to provide City Park acreage to address the population increase of their proposed planned development. For Poinsettia Shores’ population the City’s minimum City Park Standard would require developers set aside 3 acres of City Park land for local park needs. For the larger Ponto area population about 6.6 acres of City Park Land is required. The Existing LCP reserves Planning Area F as an unplanned “Non-residential Reserve” Land Use until the Public Park needs for Ponto are considered and documented. Only then can the NRR land use be changed.



- Developers have overbuilt in the Ponto area of the Coastal Zone. The City of Carlsbad has under questionable circumstances is currently choosing to ‘exempted’ Ponto developers from providing the minimum amount of unconstrained Open Space according to the City’s developer required Open Space Public Facilities Standard. The legality of these confusing circumstances is subject to a lawsuit against the City. However the City’s computerize mapping system has documented that the Ponto area of the Coastal Zone is missing about 30-acres of Unconstrained Open Space that can be used to fulfill the City’s Open Space Performance Standard that states that

15% of unconstrained and developable land must be preserved by developers as Open Space. Following is a summary of data from the City data regarding the missing Open Space at Ponto (Local Facility Management Plan Zone 9, LFMP Zone 9) in the Coastal Zone pursuant to the City's Open Space Performance Standard. If it is desirable People for Ponto can provide the City GIS map and parcel-by-parcel data base on which the following summary is based:

City of Carlsbad GIS data calculations of Open Space at Ponto area of Coastal Zone:

472 Acres = Total land in LFMP Zone 9 [Ponto area] per City of Carlsbad GIS data

(197 Acres) = Constrained land/water/infrastructure that is excluded from the City's Open Space Standard

275 Acres = Unconstrained land in LFMP Zone 9 (Ponto) subject to the City's Open Space Standard

X 15% = Minimum unconstrained Open Space requirement per the City Open Space Standard

41 Acres = Minimum unconstrained Open Space required in LFMP Zone 9

(11 Acres) = Actual unconstrained Open Space provided & mapped by City in LFMP Zone 9

**30 Acres = Missing unconstrained Open Space needed in LFMP Zone 9 [Ponto area of Coastal Zone] to meet the City's minimum GMP Open Space Standard. 73% of the required Open Space Standard is missing.**

Thus the Ponto area of the Coastal Zone appears overdeveloped with 30 additional acres of "low-priority" residential land uses due to developers' non-compliance to the City's Open Space Public Facility Performance Standard's Minimum developer required Open Space requirement. As noted a citizens group has a pending lawsuit with the City over the City's current 'exempting' Ponto and future developers from meeting the Open Space Standard.

12. The prior pre-1996 LCP for Ponto – the Batiquitos Lagoon Educational Park Master Plan & LCP (BLEP MP/LCP) had significant Open Space and recreational areas. These significant Open Space and Recreational areas were removed with BLEP MP/LCP's replacement in 1996 by the currently existing Poinsettia Shores Master & LCP (PSMP/LCP) and its City Zoning and LCP LUP requirements that reserved Planning Area F with the current "Non-residential Reserve" Land Use designation. Since the BLEP MP/LCP it appears developers and the City of Carlsbad have worked to remove "High-Priority" Coastal land uses (i.e. Coastal Recreation and Park uses) out of the Ponto area and replaced them with more "low-priority" residential and general commercial land uses. For example:

- Planning Area F used to be designated "Visitor Serving Commercial" as part of the original 1980's BLEP MP/LCP for Ponto.
- In 1996 the BLEP MP LCP was changed by developer application to the now current PSMP LCP, and the LCP LUP designation changed from "Visitor Serving Commercial" to "Non-Residential Reserve" with the requirement to study and document the need for "High-Priority" Coastal Recreation (i.e. Public Park) and/or Low-cost visitor accommodations prior to any change to Planning Area F's "Non-residential Reserve" LCP land use.
- In 2005 the City started to try to change Planning Area F to low-priority residential and general commercial land use in the City's Ponto Beachfront Village Vision Plan (PBVVP). At this time the City made its first documented Coastal 'planning mistake' by not disclosing to the public the existence of Planning Area F's LCP requirements and then also not following those LCP requirements. The City's planning process seemed focused on addressing developer's land use desires, and increasing land use intensity to boost "Tax-increment financing" as the City had established a Redevelopment Project Area at Ponto. A short time after the State of CA dissolved Redevelopment Agencies due in part to such abuses by cities. The CCC formally rejected the PBVVP in 2010, citing the City's failure to follow the LCP requirements for Planning Area F.

- Five years later in 2015 the City again adopted a proposed General Plan Update to again change Planning Area F to low-priority residential and general commercial land use. The General Plan Update cited the City's PBVVP that was in fact rejected by the CCC only a few years before. The City again repeated their PBVVP's Coastal land use 'planning mistake' by again not disclosing to the public the existence of Planning Area F's LCP requirements and then not following those LCP requirements. It is unclear why the City did this only 5-years after the CCC specifically rejected the Ponto Beachfront Village Vision Plan for those same reasons.
- In 2017 citizens found and then confirmed these Ponto Coastal 'planning mistakes' by the City through multiple official Carlsbad Public Records Requests and CCC Staff confirmation. The CCC readily identified the mistakes, but the City's 2019 proposed Draft LCP Land Use Plan and planning process still has yet fully disclose these prior Coastal 'planning mistakes' to ALL citizens of Carlsbad - the failure to disclose and follow the Planning Area F LCP LUP and City Zoning requirements. Full City disclosure is needed now to try to correct many years of City misrepresentation to citizens on LCP required Coastal land Use planning at Ponto. It is needed now so the public is aware at the start of the Public Comment Period. In 2017 citizens began asking the City fix the City's over 12-years of misinformation and planning mistakes by 'restarting' Coastal land use planning at Ponto with an open and honest community-based Coastal planning process. These citizens' requests have been rejected.
- In 2019 the City Staff proposed citywide Draft LCP land Use Plan Amendment that again proposed to change Planning Area F to "low-priority" residential and general commercial land use, without First disclosing the Planning Area F LCP requirements with corresponding analysis of the Need for Coastal Recreation (i.e. Public Park) and/or low-cost visitor accommodations at Planning Area F and providing that Documented analysis for public review/Consideration/comment. This seems like another 3<sup>rd</sup> repeat of the prior two Coastal planning mistakes by the City. In 2019, again citizens asked for a reset and a true community-based process for the last remaining significant vacant Coastal lands – including Ponto. Again the City rejected citizens' requests.
- In 2020 thousands of public requests again asked, and are currently asking, for a reset and a true community-based process for the last remaining significant vacant Coastal lands – including Ponto. Again these requests are being rejected. Based on the significant citizen concern and the documented prior 'planning mistakes' at Ponto it appears reasonable and responsible for Ponto's Planning Area F to either:
  - i. Retain its current Existing LCP LUP land Use of "Non-Residential Reserve" until such time as the City's past Ponto Beachfront Village Vision Plan and General Plan Update planning mistakes and other issues subject to current planning lawsuits against the City are resolved with a true, honest and open community-based Coastal planning process asked for by citizens since 2017. Or
  - ii. Propose in the Draft LCP Land Use Plan Amendment to re-designated Planning Area F back to a Visitor Serving Commercial and Open Space ("i.e. Public Park") to provide both "High-Priority" coastal uses v. low-priority residential/general commercial uses due to the documented Coastal Recreation and Low-cost visitor accommodation needs for both citizens and visitors at Ponto and South Carlsbad.

13. Questionable logic and inconsistency in proposed Draft land use map and policies: Chapter 2 Figure 2-2B & C on pages 2-19 & 20 proposes to Amend the existing LCP Land Use Plan Map, and policies LCP-2-P.19 and 20 on pages 2-27 to 2-29 propose Amendments to existing LCP policy and create a new added layer of policy referencing a Ponto/Southern Waterfront. The proposed Land Use Map and Policies serve to firmly plan for "low-priority" residential and general commercial land uses at Ponto with a clear regulatory Land Use Plan Map showing these land uses and by specific regulatory policy (LCP-2-20) that clearly requires (by using the words "shall") these "low

priority” uses. In contrast the “High-Priority” Coastal Recreation and Coastal Park land uses that would be designated as Open Space are not mapped at all in Figure 2-2B & C; and the proposed policy LCP-2-P.19 is both misleading and specifically does Not Require any “High-Priority” Coastal Recreation and Coastal Park land Use at Ponto and South Carlsbad. In fact page 2-22 specifically indicates two “may” criteria that would first need to occur in the positive before any potential Coastal Recreation and Coastal Park Land could then theoretically even be possible. It is highly probable that it is already known by the City that the proposed relocation of Carlsbad Boulevard (Coast Highway) is not very feasible and not cost effective, and will not yield (due to environmental habitat constraints, narrowness of the roadway median, and other design constraints) any significant dimensions of land that could potentially be designated Open Space and realistically be used as a Park.

The blank outline map (Figure 2-2B & C) provides no mapped Open Space Land Use designation, other than for the currently existing State Campgrounds’ low-cost visitor accommodations, so the proposed Land Use Plan Map is Not providing/mapping any new Open Space land use to address Coastal Recreation and Coastal Park needs. The Draft LCP Land Use Plan Amendment’s proposed/projected/planned Sea Level Rise and associated coastal erosion appears to indicate that this “High-Priority” low-cost visitor accommodation (Campground) land use designated as Open Space will be reduced in the ‘Buildout’ condition due to coastal erosion. So **the Draft LCP Land Use Plan is actually planning for a Reduction in Open Space Land Use in South Carlsbad and Ponto.** Both the blank outline map and the proposed Land Use Map Figure 2-1 DO NOT clearly map and designate both South Carlsbad’s Draft LCP Planned Loss of the Open Space Land Use and also any New or replacement unconstrained land as Open Space land use for Coastal Recreation and Coastal Park. This is an internal inconsistency in Land Use Mapping that should be corrected in two ways:

- 1) Showing on all the Land Use (Figure 2-1), Special Planning Area (Figure 2-2B & C), and other Draft LCP Maps the Draft LCP’s planned loss of land area in those maps due to the Draft LCP’s planned loss of land due to Sea Level Rise and Coastal Land Erosion. This is required to show how land use boundaries and Coastal Recourses are planned to change over time. or
- 2) Provide detailed Land Use Constraint Maps for the current Carlsbad Boulevard right-of-way that the City “may” or ‘may not’ choose (per the proposed “may” LCP-2-P.19 policy) use to explore to address the City’s (Park Master Plan) documented Coastal Recreation and Coastal Park land use shortages in Coastal South Carlsbad and Ponto. Clearly showing the potential residual Unconstrained Land within a Carlsbad Boulevard relocation that have any potential possibility to add new Open Space Land Use Designations (for Coastal Recreation) is needed now to judge if the policy is even rational, or is it just a Trojan horse.

The proposed internal inconsistency in mapping and policy appears like a plan/policy ‘shell game’. The proposed Land Use Plan Maps and Policies should be consistent and equality committed (mapped-shall v. unmapped-may) to a feasible and actual Plan. If not then there is No real Plan.

There is no Regulatory Policy requirement in LCP-2-P.19 to even require the City to work on the two “may” criteria. The City could choose to bury the entire Carlsbad Boulevard relocation concept and be totally consistent with Policy LCP-2-P.19 and the LCP. As such the language on 2-22, Figure 2-2C (and the proposed Land Use Map), and policy LCP-2-P.19 and 20 appear conspire to create a shell game or bait-and-switch game in that only “low-priority” residential and general commercial uses are guaranteed (by “shall” policy) winners, and “high-priority” Coastal Recreation and Coastal Park Land Uses are at best a non-committal ‘long-shot’ (“may” policy) that the city is specifically not providing a way to ever define, or commit to implement. The proposed Draft LCP Land Use Plan Coastal Recreation and Coastal Park statements for Ponto are just words on paper that are designed to have no force, no commitment, no defined outcome, and no defined requirement to even have an outcome regarding the



documented “High-Priority” Coastal Recreation and Coastal Park needs at Ponto, Coastal South Carlsbad and the regional 6-mile Coastal Park gap centered around Ponto.

Policy LCP-2-P.19 falsely says it “promotes development of recreational use” but does not in fact do that. How is development of ‘recreational use promoted’ when the Use is both unmapped and no regulatory policy requirement and commitment (no “shall” statement) to ‘promote’ that Use is provided? Policy LCP-2-19.19 appears a misleading sham that does not ‘promote’ or require in any way “High-Priority” Coastal Recreation and Park Land Use at Ponto. There should be open and honest public workshops before the Draft LCP Amendment goes to its first public hearing to clearly define the major environmental constraints and cost estimates involving possible relocation of Carlsbad Boulevard and constructing needed beach access parking, and sufficient and safe sidewalks and bike paths along Carlsbad Boulevard; and then map the amount and dimensions of potential ‘excess land’ that maybe available for possible designation as Open Space in the City General Plan and Local Coastal Program. The City should not repeat the mistakes at the Carlsbad Municipal Golf Course (resulting in the most expensive to construct maniple course in the USA) by not defining and vetting the concept first. A preliminary review of City GIS data appears the amount, dimensions and locations of any potential ‘excess’ land maybe modest at best. However before the City proposes a ‘Buildout’ Coastal Land Use Plan this critical information should be clearly provided and considered. It is likely the City’s Carlsbad Boulevard relocation concept is unfeasible, inefficient, too costly, and yields too little actual useable ‘excess land’ to ever approach the Coastal Recreation and Coastal Park needs for South Carlsbad. This may already be known by the City, but it surely should be publicly disclosed and discussed in the DLPCA.

The proposed Coastal Land Use Plan to address Carlsbad’s, San Diego County’s and California’s High-Priority Coastal Recreation Land Use and Coastal Park needs should NOT be vague “may” policy that appears to be purposely designed/worded to not commit to actually providing any “High-Priority” Coastal Recreation and Coastal Park land uses on the map or in policy commitments. The Land Use Plan and Policy for High-Priority Coastal Recreation and Coastal Park Land Use should be definitive with triggered “shall” policy statements requiring and assuring that the ‘Forever’ “High-Priority” Coastal Recreation and Coastal Park needs are properly and timely addressed in the City’s proposed ‘Buildout’ Coastal Land Use Plan. This “shall” policy commitment should be clearly and consistently mapped to show the basic feasibility of the planned outcomes and the resulting actual Land that could feasibly implement the planned outcome.

Providing safe and sufficient sidewalks, bike paths, and public parking along Carlsbad Boulevard: Providing safe and sufficient sidewalks, bike paths, and public parking along Carlsbad Boulevard are Coastal Access and Completes Streets issues. South Carlsbad Boulevard now and has for decades been a highly used Incomplete Street that is out of compliance with the City’s minimum Street Standards for pedestrian and bike access and safety. The Coastal Access portion of the Draft Land Use Plan should strongly address the Complete Street requirements for South Carlsbad Boulevard. Those policy commitments should be reference in Policy LCP-2-P.19 and 20 as Carlsbad Boulevard in **South Carlsbad is the most Complete Street deficient portion of Carlsbad Boulevard**. Forever Coastal Access parking demand and the proposed LCP Amendment’s Land Use Plan to supply parking for those demands should also be addressed as part of the Coastal Access and Complete Streets issues for South Carlsbad Boulevard. If much needed Coastal Access Parking is provided on South Carlsbad Boulevard as part of a “maybe” implemented realignment, most of the “maybe” realignment land left after constraints are accommodated for and buffered will likely be consumed with these parking spaces and parking drive aisles/buffer area needed to separate high-speed vehicular traffic from parking, a buffered bike path, and a sufficiently wide pedestrian sidewalk or Coastal Path. After accommodating these much needed Complete Street facilitates there will likely be little if any sufficiently

dimensioned land available for a Coastal Recreation and a Coastal Park. The needed Coastal Access and Complete Street facilities on South Carlsbad Boulevard are very much needed, but they are NOT a Coastal Park.

As mentioned the proposed Draft Coastal Land Use Plan's Maps and Policies are very specific in providing for the City's proposed LCP Land Use changes to 'low-priority' Residential and General Commercial' on Planning Area F (proposed to be renamed to Area 1 and 2). It is curious as to why the proposed Draft LCP Land Use Plan Amendment has no Land Use Map and minor vague unaccountable Land Use Policy concerning 'High-priority Coastal Recreation Land Use' at Ponto, while the very same time proposing very clear Land Use Mapping and detailed unambiguous "shall" land use policy requirements for 'low-priority' Residential and General Commercial land use at Ponto. Why is the City Not committing and requiring (in a Land Use Map and Land Use Policy) to much needed 'High-priority' Coastal Recreation and Coastal Park Land Use' needs at Ponto the same detail and commitment as the City is providing for "low-priority" uses? This is backwards and inappropriate. It is all the more inappropriate given the 'Buildout' Coastal Land Use Plan the City is proposing at Ponto. These issues and plan/policy commitments and non-commitments will be 'forever' and should be fully and publicly evaluated as previously requested, or the Existing LCP Land Use Plan of "Non-residential Reserve" for Planning Area F should remain unchanged and until the forever-buildout Coastal Recreation and Coastal Park issues can be clearly, honestly and properly considered and accountably planned for. This is vitally important and seems to speak to the very heart of the CA Coastal Act, its founding and enduring principles, and its policies to maximize Coastal Recreation. People for Ponto and we believe many others, when they are aware of the issues, think the City and CA Coastal Commission should be taking a long-term perspective and be more careful, thorough, thoughtful, inclusive, and in the considerations of the City's proposal/request to permanently convert the last vacant unplanned (Non-residential Reserve) Coastal land at Ponto to "low-priority" land uses and forever eliminate any Coastal Recreation and Coastal Park opportunities.

14. Public Coastal View protection: Avenida Encinas is the only inland public access road and pedestrian sidewalk to access the Coast at Ponto for one mile in each direction north and south. It is also hosts the regional Coastal Rail Trail in 3' wide bike lanes. There exist now phenomenal coastal ocean views for the public along Avenida Encinas from the rail corridor bridge to Carlsbad Boulevard. It is assumed these existing expansive public views to the ocean will be mostly eliminated with any building development seaward or the Rail corridor. This is understandable, but an accountable ('shall') Land Use Plan/Policy addition to proposed Policy LCP-2-P.20 should be provided for a reasonable Public Coastal View corridor along both sides of Avenida Encinas and at the intersection with Carlsbad Boulevard. Public Coastal view analysis, building height-setback standards along Avenida Encinas, and building placement and site design and landscaping criteria in policy LCP-2-P.20 could also considered to reasonably provide for some residual public coastal view preservation.
15. Illogical landscape setback reductions proposed along Carlsbad Boulevard, and Undefined landscape setback along the Lagoon Bluff Top and rail corridor in Policy LCP-2-P.20: Logically setbacks are used in planning to provide a buffering separation of incompatible land uses/activities/habitats. The intent of the setback separation being to protect adjacent uses/activities/habitats from incompatibility, nuisance or harassment by providing a sufficient distance/area (i.e. setback) between uses/activities/habitats and for required urban design aesthetics – almost always a buffering landscaping. Policy LCP-2-P.20. A.4 and C.3 says the required 40' landscape setback along Carlsbad Boulevard "maybe reduced due to site constraints or protection of environmental resources." The ability to reduce the setback is illogical in that setbacks are intendent to protect environmental resources and provide a buffer for constraints. In the Carlsbad Boulevard right-of-way there is documented sensitive environmental habitat, along with being a busy roadway. How could reducing the protective 40' setback in anyway better protect that habitat or provide a better landscaped compatibility or visual aesthesis buffer along Carlsbad Boulevard? It is

illogical. If anything the minimum 40' landscaped setback should likely be expanded near "environmental resources". Regarding reducing the minimum 40' landscape setback for "site constraints" there is no definition of what a "site constraint" is or why it (whatever it may be) justifies a reduction of the minimum landscaped setback. Is endangered species habitat, or a hazardous geologic feature, or a slope, or on-site infrastructure considered a "site constraint"? There should be some explanation of what a "site constraint" is and is not, and once defined if it warrants a landscape setback reduction to enhance the buffering purpose of a landscape setback. Or will a reduction only allow bringing the defined constraint closer to the adjacent uses/activities/habitats that the landscape setback is designed to buffer. It is good planning practice to not only be clear in the use of terms; but also, if a proposed reduction in a minimum standard is allowed, to define reasonably clear criteria for that reduction/modification and provide appropriate defined mitigation to assume the intended performance objectives of the minimum landscape setback are achieved.

Policy LCP-2-P.20.C.4 is missing a critical Bluff-Top landscape setback. It seems impossible that the DLCPA is proposing no Bluff-Top setback from the lagoon bluffs and sensitive habitat. The Batiquitos Lagoon's adjoining steep sensitive habitat slopes directly connect along the Bluff-top. Batiquitos Lagoon's and adjoining steep sensitive habitat is a sensitive habitat that requires significant setbacks as a buffer from development impacts. Setbacks similar to those required for the San Pacifico area inland of the rail corridor, should be provided unless updated information about habitat sensitivity or community aesthetics requires different setback requirements.

Policy LCP-2-P.20 does not include a landscape setback standard adjacent to the rail corridor. This is a significant national transportation corridor, part of the 2<sup>nd</sup> busiest rail corridor in the USA. Train travel along this corridor is planned to increase greatly in the years to come. Now there is significant noise, Diesel engine pollution, and extensive ground vibration due to train travel along the rail corridor. Long freight trains which currently run mostly at night and weekends are particularly noisy and heavy, and create significant ground vibration (underground noise). These issues are best mitigated by landscape setbacks and other buffers/barriers. A minimum setback standard for sufficient landscaping for a visual buffer and also factoring appropriate noise and ground vibration standards for a buildout situation should be used to establish an appropriate landscape setback that should be provided along the rail corridor. Carlsbad's landscape aesthetics along the rail corridor should be factored into how wide the setback should be and how landscaping should be provided. An example for the landscape aesthetic portion of the setback standard could be landscape design dimensions of the San Pacifico community on the inland side of the rail corridor. However, noise and vibrational impacts at San Pacifico are felt much further inland and appear to justify increased setbacks for those impacts.

## **Sea Level Rise and Carlsbad's DLCP-LUPA's projected/planned Loss of Open Space at Ponto**

### **Introduction:**

Carlsbad first documented Sea Level Rise (SLR) and associated increases in coastal erosion in a December 2017 Sea Level Rise Vulnerability Assessment (2017 SLR Assessment). Prior planning activities (2010 Ponto Vision Plan – rejected by CA Coastal Commission, and 2015 General Plan Update) did not consider SLR and how SLR would impact Coastal Open Space Land Use & CA Coastal Act 'High-Priority' Coastal Open Space Land Uses at Ponto. The 2017 SLR Assessment shows Open Space land and Open Space Land Uses are almost exclusively impacted by SLR at Ponto & South Coastal Carlsbad. The 2017 SLF Assessment also shows significant LOSS of Open Space land acreage and Land Uses. Most all impacted Open Space Land Uses are CA Coastal Act "High-Priority Coastal Land Uses" – Coastal Recreation (i.e. Public Park) and Low-Cost Visitor Accommodations. Existing Ponto Open Space Land Uses are already very congested (non-existent/narrow beach) and have very high, almost exclusionary, occupancy rates (Campground) due to existing population/visitor demands. Future population/visitor increases will make this demand situation worst. The significant permanent LOSS of existing Coastal Open Space land and Coastal Open Space Land Use (and land) due to SLR reduces existing supply and compounds Open Space congestion elsewhere. Prior Ponto planning did not consider, nor plan, for significant SLR and current/future "High-Priority" Coastal Open Space Land Use demands.

### **Open Space and City Park demand at Ponto:**

Open Space at Ponto is primarily 'Constrained' as defined by the City's Growth Management Program (GMP), and cannot be counted in meeting the City's minimal 15% 'Unconstrained' GMP Open Space Standard. Per the GMP Open Space Standard, the developers of Ponto should have provided in their developments at least 30-acres of additional 'Unconstrained' GMP Open Space at Ponto. City GIS mapping data confirm 30-acres of GMP Standard Open Space is missing at Ponto (Local Facilities Management Plan Zone 9).

The City of Carlsbad GIS Map on page 2 shows locations of Open Spaces at Ponto. This map and its corresponding tax parcel-based data file document Ponto's non-compliance with the GMP Open Space Standard. A summary of that City GIS data file is also on page 2. The City said Ponto's non-compliance with the GMP Open Space Standard was 'justified' by the City 'exempting' compliance with the Standard. The City 'justified' this 'exemption' for reasons that do not appear correct based on the City's GIS map and data on page 2, and by a review of 1986 aerial photography that shows most of Ponto as vacant land. The City in the Citywide Facilities Improvement Plan (CFIP) said 1) Ponto was already developed in 1986, or 2) Ponto in 1986 already provided 15% of the 'Unconstrained' land as GMP Standard Open Space. Both these 'justifications' for Ponto 'exemption' in the CFIP were not correct. The legality of the City 'exempting' Ponto developers from the GMP Open Space Standard is subject to current litigation.

The City proposes to continue to exempt future Ponto developers from providing the missing 30-acres of minimally required GMP Open Space, even though a change in Ponto Planning Area F land use from the current 'Non-Residential Reserve' Land Use requires comprehensive Amendment of the Local Facilities Management Plan Zone 9 to account for a land use change. City exemption is subject of litigation.

Ponto (west of I-5 and South of Poinsettia Lane) currently has 1,025 homes that per Carlsbad's minimal Park Standard demand an 8-acre City Park. There is no City Park at Ponto. Coastal Southwest Carlsbad has an over 6.5 acre Park deficit that is being met 6-miles away in NW Carlsbad. Ponto is in the middle of 6-miles of Coastline without a City Coastal Park west of the rail corridor.





### City GIS map of Ponto's (LFMP Zone 9) Open Space:

- Light green areas meet the City's 15% unconstrained Growth Management Program Open Space Standard
- Most Ponto Open Space (pink hatch & blue [water] on map) is "Constrained" and does not meet the Standard
- **Aviara - Zone 19, Ponto - Zone 9 and Hanover/Poinsettia Shores – Zone 22 all developed around the same time and had similar vacant lands.**
- **City required Aviara - Zone 19 east of Ponto to provide the 15% Standard Open Space. Why not Ponto? Aviara had the same lagoon waters.**
- **City required Hanover & Poinsettia Shores area Zone 22 just north of Ponto to provide the 15% Standard Open Space. Why not Ponto?**
- Why Ponto developers were never required to comply with the 15% Standard Open Space is subject to current litigation
- Below is City GIS data from this map

### City GIS map data summary of the 15% Growth Management Standard Open Space at Ponto

472 Acres  
(197 Acres)  
 275 Acres  
X 15%  
 41 Acres  
(11 Acres)  
**30 Acres**

Total land in LFMP Zone 9 [Ponto]  
 Constrained land excluded from GMP Open Space  
 Unconstrained land in LFMP Zone 9 [Ponto]  
 GMP Minimum Unconstrained Open Space requirement  
 GMP Minimum Unconstrained Open Space required  
 GMP Open Space provided & mapped per City GIS data  
**Missing Unconstrained Open Space needed in LFMP Zone 9 [Ponto] to meet the City's minimum GMP Open Space Standard per City's GIS map & data**

**73% of the City's minimum 15% required Open Space Standard is missing due to over development of LFMP Zone 9 [Ponto]**

### **Sea Level Rise impacts on Open Space and Open Space Land Use Planning at Ponto:**

The City's 2015 General Plan Update did not factor in the impacts of Sea Level Rise (SLR) on Ponto's Open Space land. In December 2017 the City conducted the first Sea Level Rise Vulnerability Assessment <https://www.carlsbadca.gov/civicax/filebank/blobdload.aspx?BlobID=33958>. The 2017 SLR Assessment is an initial baseline analysis, but it shows significant SLR impacts on Ponto Open Space. More follow-up analysis is being conducted to incorporate newer knowledge on SLR projections and coastal land erosion accelerated by SLR. Follow-up analysis may likely show SLR impacts occurring sooner and more extreme.

Troublingly the 2017 SLR Assessment shows SLR actually significantly reducing or eliminating Open Space land at Ponto. SLR is projected to only impact and eliminate Open Space lands and Open Space Land Use at Ponto. The loss of Ponto Open Space land and Land Use being at the State Campground, Beaches, and Batiquitos Lagoon shoreline. The losses of these Open Space lands and land uses would progress over time, and be a permanent loss. The 2017 SLR Assessment provides two time frames near-term 2050 that match with the Carlsbad General Plan, and the longer-term 'the next General Plan Update' time frame of 2100. One can think of these timeframes as the lifetimes of our children and their children (2050), and the lifetimes of our Grandchildren and their children (2100). SLR impact on Coastal Land Use and Coastal Land Use planning is a perpetual (permanent) impact that carries over from one Local Coastal Program (LCP) and City General Plan (GP) to the next Updated LCP and GP.

Following (within quotation marks) are excerpts from Carlsbad's 2017 Sea Level Rise Vulnerability Assessment:

*[Italicized text within brackets]* is added data based on review of aerial photo maps in the Assessment.

"Planning Zone 3 consists of the Southern Shoreline Planning Area and the Batiquitos Lagoon. Assets within this zone are vulnerable to inundation, coastal flooding and bluff erosion in both planning horizons (2050 and 2100). A summary of the vulnerability assessment rating is provided in Table 5. A discussion of the vulnerability and risk assessment is also provided for each asset category.

#### **5.3.1. Beaches**

Approximately 14 acres of beach area is projected to be impacted by inundation/erosion in 2050. ... Beaches in this planning area are backed by unarmored coastal bluffs. Sand derived from the natural erosion of the bluff as sea levels rise may be adequate to sustain beach widths, thus, beaches in this reach were assumed to have a moderate adaptive capacity. The overall vulnerability rating for beaches is moderate for 2050.

Vulnerability is rated moderate for the 2100 horizon due to the significant amount of erosion expected as the beaches are squeezed between rising sea levels and bluffs. Assuming the bluffs are unarmored in the future, sand derived from bluff erosion may sustain some level of beaches in this planning area. A complete loss of beaches poses a high risk to the city as the natural barrier from storm waves is lost as well as a reduction in beach access, recreation and the economic benefits the beaches provide.

#### **5.3.3. State Parks**

A majority of the South Carlsbad State Beach day-use facilities and campgrounds (separated into four parcels) were determined to be exposed to bluff erosion by the 2050 sea level rise scenario (moderate exposure). This resource is considered to have a high sensitivity since bluff erosion could significantly impair usage of the facilities. Though economic impacts to the physical structures within South Carlsbad State Beach would be relatively low, the loss of this park would be significant

since adequate space for the park to move inland is not available (low adaptive capacity). State parks was assigned a high vulnerability in the 2050 planning horizon. State park facilities are recognized as important assets to the city in terms of economic and recreation value as well as providing low-cost visitor serving amenities. This vulnerability poses a high risk to coastal access, recreation, and tourism opportunities in this planning area.

In 2100, bluff erosion of South Carlsbad State Beach day-use facilities and campgrounds become more severe and the South Ponto State Beach day-use area becomes exposed to coastal flooding during extreme events. The sensitivity of the South Ponto day-use area is low because impacts to usage will be temporary and no major damage to facilities would be anticipated. Vulnerability and risk to State Parks remains high by 2100 due to the impacts to South Carlsbad State Beach in combination with flooding impacts to South Ponto.

Table 5: Planning Zone 3 Vulnerability Assessment Summary [condensed & notated]:

<u>Asset Category</u>	<u>Horizon [time]</u>	<u>Hazard Type</u>	<u>Impacted Assets</u>	<u>Vulnerability Rating</u>
Beaches	2050	Inundation/Erosion, Flooding	<b>14 acres</b> (erosion)	Moderate
	2100	Inundation/Erosion, Flooding	<b>54 acres</b> (erosion)	Moderate
Public Access	2050	Inundation, Flooding	6 access points <b>4,791 feet of trails</b>	Moderate
	2100	Inundation, Flooding	10 access points <b>14,049 feet of trails</b>	Moderate
State Parks [Campground - Low-cost Visitor Accommodations]	2050	Flooding, Bluff Erosion	4 parcels [ <b>&lt;18 Acres</b> ]	High
	2100	Flooding, Bluff Erosion	4 parcels [ <b>&gt;18 Acres</b> ] <i>[loss of over 50% of the campground &amp; its Low-cost Visitor Accommodations, See Figure 5.]</i>	High
Transportation (Road, Bike, Pedestrian)	2050	Bluff Erosion	<b>1,383 linear feet</b>	Moderate
	2100	Flooding, Bluff Erosion	<b>11,280 linear feet</b>	High
Environmentally Sensitive Lands	2050	Inundation, Flooding	<b>572 acres</b>	Moderate
	2100	Inundation, Flooding	<b>606 acres</b>	High





Figure 7: Southern Shoreline Planning Area – Year 2050





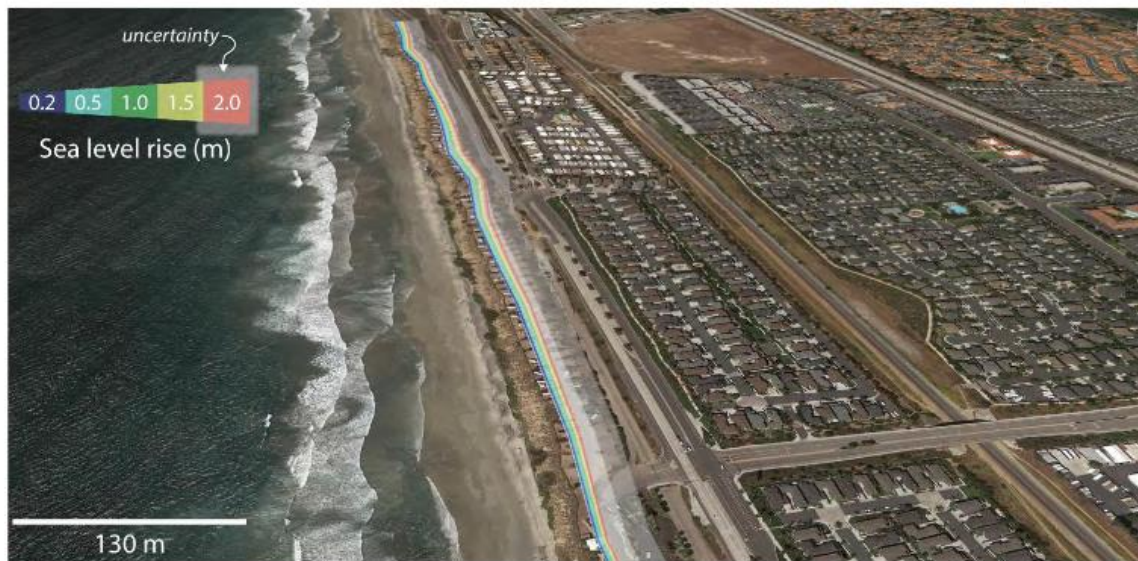


Figure 5: CoSMoS Bluff Erosion Projections by 2100  
(CoSMoS-COAST 2015)

[Figure 5 show the loss of over 50% of the campground and campground sites with a minimal .2 meter Sea Level Rise (SLR), and potentially the entire campground (due to loss of access road) in 2 meter SLF.]”

#### **Directions to analyze and correct current and future LOSS of Coastal Open Space Land Use at Ponto**

On July 3, 2017 the CA Coastal Commission provided direction to Carlsbad stating:

“The existing LUP includes policies that require certain visitor-serving developments and/or studies relevant to the Ponto ... area. For example, Planning Area F requires the city and developer to “consider and document the need for the provision of lower cost visitor accommodations or recreational facilities (i.e., public park) on the west side of the railroad. ... this study should be undertaken as a part of the visitor serving use inventory analysis described above. If this analysis determines that there is a deficit of low cost visitor accommodations or recreation facilities in this area, then Planning Area F should be considered as a site where these types of uses could be developed.”

Official Carlsbad Public Records Requests (PRR 2017-260, et. al.) confirmed Carlsbad’s Existing LCP and its Ponto specific existing LUP polices and Zoning regulations were never followed in the City’s prior Ponto planning activities (i.e. 2010 Ponto Vision Plan & 2015 General Plan Update). The projected SLR loss of recreation (beach) and low-cost visitor accommodations (campground) at Ponto should factor in this Existing LCP required analysis, and a LCP-LUP for Ponto and Ponto Planning Area F.

In a February 11, 2020 City Council Staff Report City Staff stated:

“On March 14, 2017, the City Council approved the General Plan Lawsuit Settlement Agreement (Agreement) between City of Carlsbad and North County Advocates (NCA). Section 4.3.15 of the Agreement requires the city to continue to consider and evaluate properties for potential acquisition of open space and use good faith efforts to acquire those properties.”

In 2020 NCA recommended the City acquire Ponto Planning Area F as Open Space. The status of City processing that recommendation is unclear. However the Lawsuit Settlement Agreement and NCA's recommendation to the City should also be considered in the required Existing LCP analysis.

**Summary:**

Tragically Carlsbad's Draft Local Coastal Program – Land Use Plan Amendment (DLCP-LUPA) is actually planning to both SIGNIFICATLY REDUCE Coastal Open Space acreage, and to eliminate 'High-Priority Coastal Open Space Land Uses at Ponto due to SLR.

The Existing LCP requirements for Ponto Planning Area F to analyze the deficit of Coastal Open Space Land Use should factor in the currently planned LOSS of both Coastal Open Space acreage and Coastal Open Space Land Uses at Ponto due to SLR. As a long-range Coastal Land Use Plan this required LCP analysis needs to also consider the concurrent future increases in both population and visitor demand for those LOST Coastal Open Space acres and Coastal Open Space Land Uses.

It is very troubling that demand for these CA Coastal Act 'High-Priority' Coastal Open Space Land Uses is increasing at the same time the current (near/at capacity) supply of these CA Coastal Act 'High-Priority' Coastal Open Space Land Uses is significantly decreasing due to SLR. Instead of planning for long-term sustainability of these CA Coastal Act 'High-Priority' Coastal Open Space Land Uses for future generations there appears to be a plan to use SLR and inappropriate (lower-priority residential) Coastal Land Use planning to forever remove those CA Coastal Act 'High-Priority' Coastal Open Space Land Uses from Ponto. CA Coastal Act Policies to address these issues should be thoroughly considered.

2021-2 proposed Draft Local Coastal Program – Land Use Plan Amendment (DLCP-LUPA) will likely result in City and CA Coastal Commission making updates to the 2015 General Plan, based on the existing Ponto Planning Area F LCP – LUP Policy requirements, Ponto Open Space issues, high-priority Coastal Land Use needs, and SLR issues not addressed in the 2015 General Plan.

## **2022-June General Comparative tax-payer Costs/Benefits of Completing PCH, PCH Modification, and 14.3 acre Ponto Park to address planned loss of 30+ acres of Coastal Open Space Land Use at Ponto/WestBL/South Carlsbad: Part 1 of 2**

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Key points regarding tax-payer Cost/Benefit comparison:

City Park Fairness: Ponto/Coastal South Carlsbad has ZERO Parks and ZERO Park acres v. 10 Coastal Parks totaling 37 acres in North Carlsbad. South Carlsbad is home to 62% of Carlsbad citizens and the City major visitor industries, and they have no Coastal Park. North Carlsbad is home to 38% of Carlsbad citizens have the entire City's Coastal Parks. The City also falsely allowed Ponto Developers to NOT provide the required 15% unconstrained Growth Management Open Space required by other adjacent developers in Carlsbad. Consequently Ponto is already developed at a density 35% higher than the rest of City.

What is missing from South PCH: The only missing components of a Carlsbad Livable (Complete) Street are adequate Coastal sidewalks/pedestrian paths. Better safer protected bike paths for the volume of bike traffic on a higher-speed roadway are highly desired. Both these missing features can be cost-efficiently provided in the existing PCH configuration. The City had over 35-years to provide the missing sidewalks on PCH and should have added sidewalks years ago.

Generalized Costs: Costs initially came from publicly stated costs by Mayor Hall in a 2019 at Meet the Mayor Realtor luncheon at Hilton Garden Inn, the City's 2001 PCH Feasibility Analysis for PCH Relocation, the earlier \$13 million per mile cost for the simpler .85 mile City CIP #6054 PCH Modification Project at Terramar, general City cost data from official public records requests, and vacant Ponto land costs of \$1.4 to \$2.4 million per acre from recent recorded land sales at Ponto.

In May, 2022 the City released an updated cost increase for the .85 mile Terramar PCH Modification of \$22.4 million per mile; and an updated cost of between \$85 - \$60 million for the 2.3 mile South PCH Relocation Proposal that comes to \$40 to 26.1 million per mile. Kam Sang listed their 14.3 acre vacant site at Ponto for sale for \$2.7 million per acre in May. The Kam Sang list price is a bit higher than recent Ponto land costs, but the Kam Sang site is of significantly higher quality being adjacent to Batiquitos Lagoon, and with 270 degree lagoon and ocean views.

Generalized Benefits: The number of acres and the quality and usability of each of those acres, and the number of new added beach parking for each of the known Option's define each Option's benefits. There may be other unknown Options that have different benefits. The City's 2001 PCH Relocation Feasibility Analysis's highest Park and Open Space Option (2001 ERA Financial Analysis "Alternative 1-parks and open space scheme") only made possible a 4-acre Active Park north of Palomar Airport Road in North Carlsbad. The City's 2013 PCH Relocation Concept design eliminated that 4-acre Active Park and only showed a few small open space areas with picnic tables. Any PCH Modification benefits are limited by existing PCH constraints. See attached Part 2: City PCH map with numbered notes on various existing environmental and land use constraints from the City's 2013 PCH Modification Design.

PCH Modification limitations: Most critically PCH Modification does NOT add any new City land. Rearranging existing PCH land may add some usability beyond the usability of existing parkway areas along PCH. However significant land in PCH right-of-way is already constrained by habitat, slopes, and water quality detention basins. Past City Studies in 2001 and 2013 showed relatively modest changes in useable acreage from major PCH Modifications. Forever removing 2-travel lanes (over 50% of PCH capacity due to removing passing ability) will

create Terramar like traffic congestion, but could repurpose that City pavement for open space. Any net usable land in the PCH median will be relatively narrow and may be modest once all constraints are accounted for. PCH Modification should be accurately compared with the existing usable and open space parkway areas in the existing PCH configuration and Ponto Park situation. See attached Part 2: City PCH map with numbered notes on various existing land use constraints from the City's 2013 PCH Modification Design.

#### **Four (4) Comparative tax-payer Cost/Benefits:**

##### **1. Completing PCH & adding missing sidewalk/path and additional public parking and bike safety:**

4 vehicle lanes and 2 bike lanes 177 parking spaces currently exist along South Carlsbad Blvd

The only missing component of "Complete/Livable Street" is a pedestrian sidewalk/path on about 70% of PCH

**Total Cost to provide missing sidewalks per City data = \$3-5 million (based on path width)**

**Costs for desirable safety upgrade to existing bike lanes are not known**

**Cost to add more Beach parking on City owned abandoned PCH North and South of Poinsettia ranges from:**

- 273 additional spaces = \$ 0.76 million
- 546 additional spaces = \$ 1.1 million
- Plus an estimated \$1.5 million for 2 signalized intersection upgrades for full 4-way access
- Cost per parking space is estimated at \$19,275 to \$13,899 per additional parking space

**Total cost: \$ 3.8 to 6.1 million to provide missing sidewalk/path and add more parking + unknown amount for any desired upgrades to existing bike lanes**

##### **2. '2013 2.3 mile PCH Modification Proposal' [AECOM 11/26/2013 Alternative Development Meeting]**

Total Cost is \$75 million per Mayor Matt Hall, but updated by City to \$85-60 Million or \$40-26.1 million per mile.

The costs appear consistent with 20-years of cost inflation of the basic (unmitigated environmental and traffic)

2001 costs of \$26.5 to 37.3 million (in 2001 dollars) identified by the City's 2001 Feasibility Analysis by ERA. The

City's 2001 ERA Analysis indicated fully mitigated costs will be higher.

**Total \$85 to 60 million PCH Modification cost comes to:**

**\$ 21 to 6 million per acre to reuse existing City land into narrow open space areas (from portions of city roadway)**

**\$872,093 per additional parking space**

- 86 additional parking spaces created = 263 replacement spaces - 177 existing spaces removed
- Includes multi-use pathway (sidewalk) within primarily native/natural landscaping.
- Possible 50% reduction in vehicle lanes (from 4 to 2 lanes) with corresponding traffic congestion like at Terramar. Not clear if Citizens and tax-payers will approve spending \$85 - 60 million to double traffic congestion.
- Includes about 4 - 10 acres for possible narrow passive Park area identified in City's 2001 PCH Modification Feasibility Analysis by ERA. However City's 2013 PCH Modification (AECOM) plans look like smaller acreage is provided.
- Does not purchase any new City land (only reconfigures existing City land) so requires Carlsbad Citizens to vote to expend funds per Proposition H, and as noted in the City's 2001 Feasibility Analysis likely will not qualify for regional, State or Federal tax-payer funding.
- 2013 PCH Modification proposal could not/did not consider and map City's 2017 sea level rise data to show what areas would be lost due to sea level rise and account for any added cost and issues.



### 3. 14.3 acre Ponto Coastal Park

**Total Cost: \$52.3 million that includes \$38 million (full list price) to purchase 14.3 acres plus \$1 million per acre to landscape/irrigate like the recent development cost for Buena Vista Reservoir Park (aka Poinsettia 61). \$ 3.7 million per acre is the cost for buying 14.3 acres of New City land and developing a true City Park.**

**Ponto Park purchase:**

- **is \$3.7 million per New Added Park Acre v. \$21 to \$6 million per acre to NOT buy new land but simply repurposed existing City land in PCH,**
- **Saves tax-payers \$17.3 million to \$2.3 million per acre,**
- **Saves tax-payers \$32.7 to \$7.7 million, and**
- **Provides up to 278% to 43% more Parkland than the 2.3 mile 'PCH Modification option'**
- Includes adding 14.3-acres of new and viable parkland similar to (but twice as large) as Carlsbad's Holiday Park. Site includes habitat and habitat connection to Batiquitos Lagoon, and lagoon and ocean view trails that connect to the ocean and eventually east along Batiquitos Lagoon to El Camino Real.
- Since an Open Space land purchase per Proposition C acquisition voters exempted such purchases from Proposition H. NCA already recommended vacant Ponto land be considered for City purchase as Open Space per the City's obligations under a lawsuit settlement.
- Ponto Park's cost savings over '2.3 mile PCH Modification' = \$32.7 to 7.7 million
- Ponto Park's + adding missing sidewalks cost savings over 'PCH Modification' = \$28.7 to 2.7 million
- Ponto Park's + adding missing sidewalks + 273 additional parking spaces cost savings over "PCH Modification" = \$28 to 2 million
- Ponto Park's + adding missing sidewalks + 546 additional parking spaces cost savings over "PCH Modification" = \$27.6 to 1.6 million

### 4. Combining both #1-PCH Completion and #3-Ponto Park:

Combining #1 and #3 creates at cost effective and more beneficial Coastal Park-Coastal Parking-Completes Streets solution. This solution actually adds 14.3-acres of New City land for a needed Park, provides for a Complete PCH without increasing traffic congestion, does not forever congest PCH travel if future PCH traffic increases, adds comparatively more beach parking, and preserves PCH land and provides the City with Coastal land use and sea level rise planning flexibility to address future needs by not forever committing the City's PCH land to a Final solution. See map on page 4 showing land use synergy of combining #1 and #3. **\$27.6 to 1.6 million in tax-payer cost savings are estimated from combining #1 & #3 compared to the estimated \$85 - 60 million PCH Modification of 2.3 miles. Combining #1 and #3 provides all the PCH Modification features, added beach parking benefits, and Adds 14.3 acres of New City land for parks, provides the City 100% of the flexibility it will need to address sea level rise, and do so for a reduced cost to tax-payers.** Page 5 shows the synergistic beach parking and Ponto Park relationship. The new 14.3 acre Kam Sang Ponto Park site is just south of the 11-acre Planning Area F site and between Avenida Encinas and Batiquitos Lagoon.

- a. Ponto Park's location allows it to use the 337-610 parking spaces created by #1 above (177 existing + 273 to 546 new parking spaces). The 337-610 parking spaces will allow Ponto Park to effectively host Carlsbad's special community events.
- b. Acquiring Ponto Park's 14.3-acres provides both the City and State of CA with important future land use options to address the Sea Level Rise and Coastal Erosion (SLR) planned by the City. These options are created by leaving the exiting South Carlsbad Blvd right-of-way substantially the same (except for adding needed sidewalks and using the existing Old paved roadway for parking) thus allowing future upland relocation of the Campground. If \$85 to \$60 million is spent on #2 the

likelihood this very expensive City expenditure would never be abandoned by the City to allow relocation of the Campground.

- c. Carlsbad' 2017 Sea Level Rise study shows SLR will eliminate ½ of the State Campground – a high-priority Coastal land use under the CA Coastal Act. The CA Coastal Act calls for “upland” relocation of high-priority Coastal land uses due to SLR impacts. Ponto Park could also provide for “upland” relocation of the State Campground.

Part 2 of this Comparative analysis is a separate 2-page map and data file. This Part 2 file consists of the City's PCH map of a reduced one lane in each direction (greater than 50% roadway capacity reduction) PCH configuration that maximizes potential 'excess right-of-way'. That map has numbered notes to marking locations of PCH environmental and design constraints from the City's 2013 PCH Relocation design, maps the City's 2017 Sea Level Rise Impact Areas, and for reference outlines the easterly 6.5 acre portion of the 11-acre Planning Area F site for acreage comparison purposes.



## City's PCH Modification Proposal Area Map with notes on usability Constraints and Issues: P4P Input 2 of 2

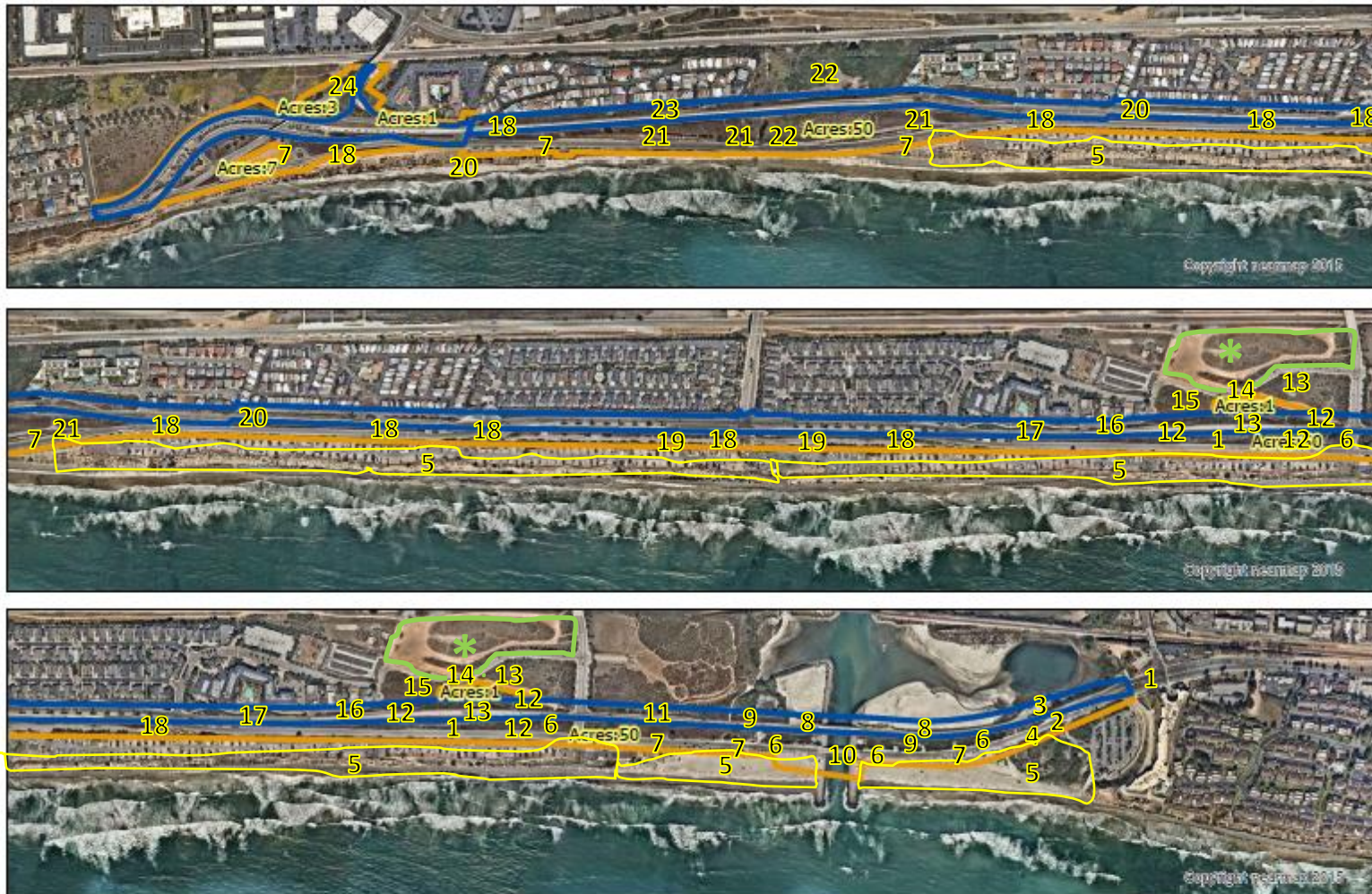
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The City's map below is marked with the following numbered list of Area Constraints and Issues. The Constraints are from the City's 2013 PCH Modification designs, the City's older 2017 Sea Level Rise Impact Study, and on-site observations. The Constraints will limit any fundamental change to the existing PCH landscape. For instance existing slope and habitat area will remain or have to be relocated which will limit the use of any excess land area from PCH Modification. These Constraints will then reduce from 62 acres the actual number of unconstrained and acres that are actually useable and can be used for different uses than currently exist.

1. Loss of the last section of Old "Historic 101" design, ambiance, and openness. Will it be replaced with typical urban arterial design?
2. Freshwater habitat
3. Sewer pumping facility
4. City's 2013 PCH plan for RESTORED RIPARIAN HABITAT
5. Sea Level Rise 2 meter Impact Area
6. City's 2013 PCH plan for BIO SWALE AND RESTORED RIPARIAN HABITAT
7. Existing beach parking to be retained
8. Least Tern habitat
9. Major storm water detention basin
10. Water
11. Slopes will likely need retaining walls to move road inland closer to proposed Kam Sang Resort
12. Endangered Species Habitat
13. City's 2013 PCH plan for COASTAL SAGE SCRUB RESTORATION
14. City's 2013 PCH plan for NATIVE GRASSLAND RESTORATION
15. City's 2013 PCH plan for BIO SWALE AND RESTORED RIPARIAN HABITAT
16. Eliminating access road for homes/businesses south of Cape Rey Resort. Who pays to replace?
17. Removes Cape Rey Resort developer required GMP Open Space for this LFMP. This GMP Open Space will have to be replaced. Who Pays?
18. City's 2013 PCH plan for L.I.D. BASIN / BIO SWALE
19. City left several acres vacant for 20+ years. This area can cost-effectively provide 200-500 more parking spaces w/o any PCH relocation.
20. Unusual jog in roadway. Is this viable?
21. City's 2013 PCH plan for RESTORED NATIVE LANDSCAPE
22. Habitat & need to provide major storm water quality detention basin before discharging urban and creek runoff into ocean.
23. Slopes will likely need retaining walls to move road inland closer to mobile home community.
24. Steep unusable slopes needed for Palomar Airport Road overpass over railroad corridor.

For a Cost/Benefit reference point, the City's PCH Modification at Terramar (CIP project #6054 from Cannon to Manzano) that is less constrained and simpler than South Carlsbad is projected to cost around \$13 million per mile. Vacant primarily unconstrained land sale costs at Ponto are documented at around \$1.4 to \$2.4 million per acre. Honest Cost/Benefit of these two options should be a public tax-payer discussion.





0 250 500 1,000 Feet  
Scale: 1:10,000

**Carlsbad Boulevard Realignment: Right-of-Way and Available Land Analysis\***

- Proposed ROW (Approximately 43 acres)
- Area Available for Other Uses (Approximately 62 acres)

July 13, 2021

\* Analysis is based on aerial imagery. Right-of-way boundaries and acreages are approximate and intended for planning level analysis only.

Item #14

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\* For comparative visual reference the \* area is the 6.5 acre eastern portion of Planning Area F.

Submitted: May 28, 2020

Dear Carlsbad City Council, Carlsbad Planning and Parks Commissions, and Coastal Commission:

The City Budget should address both short-term Covid-19 impacts, and near/longer-term investments needed for Economic Recovery and Revitalization.

The quality of our Carlsbad coastline, Coastal Parks and open spaces are continually rated by Carlsbad citizens and businesses as the critical foundation of our quality of life, economic strength, and tourism industry. Ponto Coastal Park is a critically needed investment, and the last opportunity for the City to make an investment for Carlsbad's long-term sustainability. South Carlsbad Citizens, visitors, and the Visitor Industry have no Southern Coastal Park. Ponto is the only place to provide that needed investment for residents and visitors, and advance Economic Recovery and Revitalization of South Carlsbad's significant Visitor Industry. Coastal Recreation is the major attraction for visitors.

With these understandings we submit the following testimony and data from the City's FY 2019-20 Budget Public Input Report that highlights the documented significant number of citizens asking for a Ponto Coastal Park. We also note concerns about the Report's dilution of specific citizen input provided at both the March 4, 2019 and 2020 Citizen Workshops.

Citizen input on the need for a Ponto Coastal Park was the most numerous specific place need/desire citizens mentioned in the City's:

- Budget Public Input process,
- Draft Local Coastal Program Amendment process, and
- Parks Master Plan Update process.

The Budget Public Input process documented 85 specific, verbatim citizen comments on Ponto area park needs and over 90% of citizen requests that Council budget to address this need. These 85 Verbatim Citizen comments (listed at the end of this testimony and data) specifically address how they would like their (Park) tax dollars budgeted. Additionally, 2,500 similar public input email/petitions were submitted as public comments on Carlsbad's Draft Local Coastal Program Amendment and Park Master Plan Update processes spoke to the need for a Ponto Coastal Park.

As you know, the 11-acre Ponto Planning Area F site is for sale. This site is similar in size/shape as Holiday Park, providing a Coastal site for similar multipurpose community functions.

Carlsbad's Local Coastal Program (and thus General Plan and Zoning Code) requires the City to first consider and document the need for a "Public Park" before any land use can be planned for the Planning Area F site.

The City's Park Master Plan already documents the need for a Ponto "Public Park", showing the area as "unserved" by City Parks and an area of Park "inequity" correlating well with Citizen input.

The City also received offers of potential donations, or cost-saving collaborations from Carlsbad Citizens and non-profits to advance the much needed Ponto Coastal Park. The City disappointingly has not replied to these special opportunities.

**Therefore, it is requested the City budget for a Ponto Coastal Park and contact the Planning Area F landowner regarding site purchase.**

Consistent with Budget Public Input Report page 3 it is requested that this this testimony and data be provided to the Planning and Parks Commissions; and Coastal Commission as public input on the City Staff's proposed 1) City Budget, 2) Draft Local Coastal Program Amendment, and 3) Parks Master Plan Update.

Thank you.  
People for Ponto

The following data is from the Carlsbad FY 2019-20 Budget Public Input Report:  
<https://www.carlsbadca.gov/civicax/filebank/blobdload.aspx?BlobID=38546>

In reading the data different text treatment is used to differentiate between actual page number and text in the Report, Important Report text, and public comments and analysis of Report text. Following is a legend to those text treatments:

- (p.X) is the Report page number where the information is found, and normal text is the actual Report text.
- Text in **Bold Face** is particularly important Report text.
- **Arrow bullets and Text in Bold Italic Text** are analysis and comments on the Report's information.

Introduction (p. 3):

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- **Members of the public have a right to be involved in decisions affecting their lives.**
- **It is the city's responsibility to seek out and facilitate the involvement of those interested in or affected by a decision. The city errs on the side of reaching out to people who might not be interested, rather than potentially missing people who are.**
- **City staff provide balanced and factual information to the public and do not engage in advocacy.**
- **Public dialogue strives for a focus on values over interests and positions.**
- **Public involvement planning is coordinated across all city departments to ensure consistency and avoid process fatigue.**

On (p. 5) specific Verbatim Public Input was generalized by City Staff as follows:

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Main Themes: The following themes were a high priority overall:

- **Neighborhood quality of life**
- **Access to nature, trails and open space**
- Environmental sustainability
- Traffic and mobility

Most Important Services: City services in the following areas were identified as the most important:

- **Neighborhood quality of life**
- **Parks and recreation**
- Law enforcement
- Fire and paramedic service

- Environmental sustainability

Specific Areas for Budget Enhancement: When asked which services they would like to see enhanced in next year's budget, the top five responses were:

- Neighborhood quality of life
- Parks and recreation
- Environmental sustainability
- Mobility/transportation
- Arts and culture

- *The lack of a Coastal Park at Ponto impacts all South Carlsbad neighborhoods' quality of life. Carlsbad's Park Master Plan documents that Ponto and Coastal South Carlsbad are "not served" by parks and Ponto and Coastal South Carlsbad is an area of park "inequity"*
- *The City and CA Coastal Commission are required to consider and document the need for a "Public Park" before any planning to allow any land use on Ponto Planning Area F. For over 10-years the City failed to disclose and follow this requirement – making multiple "Ponto planning mistakes". The City will now have to correct its multiple "Ponto planning mistakes" as part of the Draft Local Coastal Program Amendment*
- *The lack of a Park at Ponto also impacts both Environmental Sustainability and Mobility/Transportation:*
  - *Prevents parks within walking distance, forces driving (and the need for more parking in our Park) to access parks.*
  - *Forces South Carlsbad Neighborhoods to drive long distances to North Carlsbad and/or Encinitas to access a Coastal Park*
  - *Congests North Carlsbad and/or Encinitas Coastal Parks with South Carlsbad Coastal Park demands*
  - *Congests North Carlsbad and/or Encinitas roadways and parking facilities with South Carlsbad Coastal Park demands.*
  - *Importantly, it would forever negatively impact the economic sustainability of Carlsbad's Visitor industry. There are thousands of inland South Carlsbad resort/hotel rooms that have no access to a Coastal Park. This will ultimately undermine the attractiveness and competitiveness of South Carlsbad's Visitor industry and the tax revenue the City receives from that industry.*

Word Maps (pp 6-8)

Staff provided 3 'word maps' saying the show the words mentioned at the March 4<sup>th</sup> 2020 workshop attend by 38 citizens.

- *There is citizen concern about the accuracy of these word maps and what is conveyed on pages 6-8 of the Report.*
- *Several of those 38 citizens, provided specific written (individual index cards) and verbal (round table flip chart notes) Pubic Input several stating the need for a "Ponto Coastal Park", another mentioned a "liner Park", and several mentioned the "Senior Center", all these written/verbal comments were not accurately documented or reported on pages 6-8. It appears the City Staff interrupted and translated/transformed the actual citizen comments (as documented in the index cards and flip chart notes) when creating the word maps. There is a concern that specific citizen input provided at the actual workshop was not accurately*



➤ ***Surprisingly no word map was provided in the Report for the much larger (1,330 to 1,710 person) March 5-22, 2019 Public Input process. Following is the actual word map the city showed participants at the March 4, 2019 Public Input Workshop. The image of the word map was taken with a participant's cell phone. It summarized the magnitude of citizen needs/desires expressed at this larger Budget workshop.***



Verbatim Comments (pp 24-91): ***Number of times a specific Place Name was mentioned:***

- Page 4 of 11

- Poinsettia Park: 2 times, this is 2% as much as Ponto area
- Veterans Park: 2 times, this is 2% as much as Ponto area
- Rancho Carrillo: 1 time, this is 1% as much as Ponto area
- Hub Park: 1 time, this is 1% as much as Ponto area
- Crossings Golf Course: 1 time, this is 1% as much as Ponto area
- Robertson Ranch: 1 time, this is 1% as much as Ponto area
- Palomar Airport: 1 time, this is 1% as much as Ponto area

➤ ***As the Budget Public Input Report suggests, reading of each of the Verbatim Comments of actual public input should be done. The place names area specific list above does not include broad places such as “beaches” the names of specific roads, and other names that appeared vague. It is clear in reading through and counting the place name references that the Ponto area expressed as Ponto, Zone 9 (i.e. Local Facilities Management Plan Zone 9), and the coastal park references to Southwest Carlsbad and South Carlsbad was by far the greatest area of public input. This makes perfect sense in that for half of the City Ponto is the last significant vacant Coastal land available to address two of Carlsbad Citizens’ most important budget concerns ‘Neighborhood quality of life’ and ‘Parks and recreation’ that relate to core community values around Carlsbad’s “Beach”, “small beach town character”, and “valued open space”.***

***Following is the listing of the Verbatim Public Input (Appendix A in Public Input Report, pp 24-91) that specifically referenced Ponto or a clear reference to Ponto such as Zone 9 or Coastal Park needs in Southwest Carlsbad. There are many more comments such as “The purchase of remaining open space for preservation of the last remaining coastal areas.” that logically and clearly refers to the Ponto situation. However these many additional comments were excluded from the list below since they did not specifically mention Ponto, Zone 9, or SW Carlsbad place names.***

***Of the 85 citizen comments below specifically referencing Ponto, 77 or 90.6% were asking the City to budget for a Ponto Coastal Park. Only 8, or 9.4% of those citizen comments were not asking for a Ponto Coastal Park. We are not sure if the 8 commenters knew about the City’s now acknowledged “Ponto planning mistakes” dating back over the past 10-years, as the City only first briefly acknowledged this recently on 1/28/20. We have found once citizens are truly aware of the facts and prior “Ponto planning mistakes” there is almost uniform desire for a Ponto Coastal Park. There is citizen concern that these “Ponto planning mistakes” are not being fully, openly and accurately being disclosed to Citizens during the various Public Input processes, thus tainting those Public Input processes.***

Verbatim Ponto City Budget Public Input from pages 24-91 of FY 2019-20 Budget Public Input Report:

1. My biggest disappointment is the lack of park facilities in my section of the city, near South Ponto Beach. Lots of open land but no park within at least 2 miles. This should be a city priority
2. It used to be the beach but now Ponto & South Carlsbad are more like rocky shores. I’d like to see the rocks cleared up and more sand added to these beaches
3. COMMENT TRAFFIC IS BEING SPAMMED HERE TO PUSH THIS PONTO PARK PLOY (PPP) Develop Ponto and have the hotel maintain our beach! It’s all rocks currently!
4. Ponto Beach. We do NOT need a commercial development or hotel there. That needs to be a park and/or open space for future generations.

5. Ponto beach.
6. Don't ruin South Ponto Beach with condos and/or hotel, need to restore the sand on the beach.
7. Like most residents and visitors I treasure the beach. I feel the highest priority should be open space and parks that serve the beach region. Particularly important is the open space still available in the Ponto region. There is ample space here for an extraordinary area of open space and even a park. There is not one of either of these in the southwest quadrant near the beach. Children cannot walk safely to a park from that area. Open space and a park in the Ponto area would serve all residents, visitors, and the business community.
8. Beaches, parks, safe neighborhoods, OPEN SPACE! Need Beach parks like Del Mar Powerhouse/Sea Grove Park & Encinitas Community Park. Ponto Beach needs some attention.
9. I love the beach and the parks and fields and open space and hiking trails in Carlsbad. I wish we had more!! We have had 3 kids in sports in Carlsbad. Currently, field/park space is very limited and often over committed. Currently, there aren't enough fields to meet the need of the community. Adding more parks and fields would create a better community in the following ways.... The sports played on these fields help keep our kids fit and healthy; It keeps kids busy and out of trouble; It fosters friendships and community; it teaches team work and fosters dedication and teaches a willingness to help others succeed; it brings in community \$\$ from other teams who come to play on Carlsbad fields; It's a wonderful way to showcase our city to others who will want to return thus helping grow tourism. Additional Parks would offer the same benefits. We do not need more high density building. And, Please do NOT ruin Ponto with more building!!!!!!
10. We love the beach and the small-town feel Carlsbad has. We love the scattered open spaces and trails. Carlsbad is a great place to live and spend time outdoors, like the Ponto area. Let's keep it that way by not developing every last square foot into a condo complex, hotel or shopping mall, if that's what you want please move to Oceanside.
11. Let us protect the valuable open space that is left and not develop every square inch. Especially at the beach, let us save the land across the coast highway from Ponto Beach and make a beautiful park, not more condos and hotels. Carlsbad is in great financial shape and does not need to go after every development and tax dollar it can get. Some things are more important, like quality of life, than a fat wallet. I know that this will fall upon deaf ears amongst the two older members of the City Council, but maybe some rearranging of priorities is in order.
12. Would love to see the last areas of open land to stay that way. I have lived here for 25 years and have seen a tremendous amount of development eating away at the open beauty of the area. We have enough shopping centers and homes. Please leave the area at Ponto open and do not approve the Ponto development.
13. Keep Ponto Beach development free!
14. Preserving Open Space and Building Ponto Park in the South West Quadrant!
15. I second Tisha Klingensmith's comment and all the others regarding Ponto Beach development.
16. Preserving open space and maintaining high quality Parks and Rec with park location emphasis on geographical location. It's time to build a park in the SW quadrant near the beach for locals and visitors alike. Veterans Park is not a solution for each quadrant's deficiency, particularly in the south.
17. We need more parks, especially in southwest Carlsbad!
18. I agree, we need more parks and open space. I live in Zone 9 and don't have a park anywhere within walking distance.
19. We need to continue to preserve open space and NOT develop Ponto into an awful condo complex. We would love a park!

20. We need a park in the Ponto area and not a development. It is the last open space next to the beach left
21. I agree with the need to preserve open space throughout Carlsbad and NOT develop Ponto into awful condo complex.
22. We need to preserve our open space --it's what keeps the city feeling like a small town. We need more parks -esp one at Ponto in the SW quad!
23. Preserve the open space and build a park in SW quadrant at Ponto. We do not need or want any more huge developments, especially right by the beach in one of the last remaining open spaces. Once it's built, you can't un-build it. Build Ponto Park in SW quadrant. Do the right thing. Especially for our children and grandchildren. They won't thank us for building outrageously tall high density condos, hotels and unnecessary shops right by our gorgeous beaches. The only people this benefits are some wealthy developers, not the people of Carlsbad. Think long term, not short term. We have a beautiful city and community-preserve it now or it's gone forever!
24. We really need a park in the southwest quad by the beach. This could be an amazing asset (on SO many levels) for the community and visitors alike. The revenue stream would return the city investment in spades!
25. Parks. Needed in Ponto area our children in this area don't have a close park. And the house lots in our area are small.
26. I agree that we should be very mindful that the citizens of Carlsbad voted out the retail space plan at the power plant site a few years ago. The new Ponto project should not replace that. Citizens should be part of the decision to build out that area
27. We need to preserve our open space and we need a park at Ponto!
28. We need a park in the Southwest quadrant of our community. Safety in the community is what we like best in this area
29. Carlsbad's small town feel, friendly atmosphere and location has made it our ideal place to live for the past 20 years, We live across from South Ponto Beach and DESPERATELY need a park for our area residents. It would be sad to see the area overbuilt with high density projects and not retain some of the open space at this southern entrance to our "Village by the Sea". PLEASE help preserve some of its appeal before it is too late.
30. I love the quaintness of the Village, the open land areas, trails, small businesses and the arts. A huge NO to PONTO. Please stop the excessive building and development of the open areas of our beautiful and unique city. We have lived here for over 30 years and are sad to see so much over development. Keep our special village a village, and please don't turn it into another ordinary city.
31. Favorite is small town feel and the beach --the beach provides us with all the open space we need. The city has enough open space with all the lagoons, etc. --we don't need any more parks --especially at PONTO --I am thrilled to see and drive by every day the new resort at La Costa which is in Encinitas and that is what we need here at the South end of Carlsbad --more residential --NO more open space
32. What I love about Carlsbad is that it has a small village feel but it also has the beach and some restaurants and then little town. I really would like more to walk to around the Ponto area. Specifically I think it should be more of a beat centered area with places to grab ice cream or grab some food or a coffee and walk to the beach.
33. I love that our village that is not a strip of 101. The quaint cottages helped Carlsbad have a downtown feel. It has several streets with unique interest. I love the Trees on Grand! The landscape of the trees setting the height of the town. Unfortunately the taller buildings are killing that. Vertical dwellings are taking over.. think of the reason you travel to Europe. It's not



for Developers Generica. We also want the NRG power plant space into a Park... and... I would LOVE for the city to finish the rail trail to Ponto. Imagine taking a trail to Ponto? It would be a dream!

34. Our San Pacifico Community and the surrounding neighborhoods need a local park. So far Carlsbad has no real performing arts venue of any size to meet the needs of a city of more than 100,000. This should be a serious consideration when the new civic center is being designed.
35. We need more coastal parks and open space. Especially in zone 9
36. protect more open space, including Ponto
37. We need Veterans Park completed and Ponto park developed. Everyone in Carlsbad is engaged and we have been talking about the park deficits for a while now. Veterans park is over-due!!!
38. Our libraries are the best in the region! But I have to put them 4th to our Neighborhood quality of life, which is being impacted by huge developments destroying our property values, our piece of mind and privacy. We do need to insure that our environment is cared for, since all of these housing projects are going in. I do love our parks but we need to insure that the SW quadrant has their share of parks (think-Ponto).
39. Zone 9 (in southwest Carlsbad) does not have a park within walking distance! I hope the City can remedy this.
40. Ponto needs a park not a hotel or more condos. Please stop building on every last piece of land
41. See previous comment concerning the lack of a local, beach oriented park in the South Ponto area. Ditto a performing arts venue.
42. PLS get the Ponto Project development going....., that area of Carlsbad needs it asap
43. I support Ponto Development. PLs get it going...
44. Ponto has 2 miles of unobstructed beach access and a lagoon that already act as a "park within walking distance". The Ponto project was approved long ago and is part of the citizen approved master plan. Please get it done.
45. Strengthen and protect the financial stability of the City. Businesses pay a significant amount of taxes, property, sales and income and those employed spend and live here. Encourage affordable housing opportunities for everyone, think outside the box and find some unique solutions. Complete build out in areas available, Ponto Beach is a great opportunity and the project is well thought out, get it built. And please don't become a 'Nanny City' and waste time to pass frivolous laws restricting straws, plastic bags, soda consumption, etc.
46. Development of open space and parking space in the Ponto region
47. Specifically, I want the city to remedy the lack of equal access to parks and trails evident in the southwest quadrant of the city. I support a park project at Ponto: in the long run, the south coastal gateway to Carlsbad needs a welcoming park with beach access and supporting facilities. Though less extensive than Village beach areas, good design would merge a Ponto park with access to beach and access to the 'memorial area on the bluff at city border with the ecology of the Batiquitos Lagoon adjacent to make a marvelous creek to beach environment accessible for all and ever.
48. There are two miles of unobstructed beach plus the lagoon within "walking distance" of the neighborhoods near Ponto. The project was approved long ago and is part of the Master Plan approved by the citizens of Carlsbad. Zoning changes and project vote downs are often just another way to steal private property.
49. Local park deficits continue to be a problem. Let's please support Ponto Park development. We as a city are losing an unobstructed landmark in our community. Please share some of that with local residents. And, did I mention parking??
50. The extreme southwestern (Ponto) area of Carlsbad does not have a park within walking distance -this is my top priority to fix.

51. We have wonderful neighborhood parks, but not in Ponto and it's on the beach; Veteran's Park is more of a hiker/nature lover's place to enjoy nature.
52. We need a park at Ponto - to serve not only residents, but visitors and tourists.
53. A park is much needed in SW Quadrant of the city
54. Ponto Park. So much has been done for businesses, tourism, etc. This is the last bit of Carlsbad coast line left. And the residents could use more park space in the south part of the City. I don't want to see this area developed. Carlsbad has become overdeveloped.
55. I want to see a park for the Ponto road area. I feel that that area should not be used for condo - residential development. It is so important to showcase that wonderful piece of property, which is so rare to find all up the coast of Calif. and would be a welcomed park for all as you drive north into Carlsbad. ALSO I am very concerned that the Palomar Airport and the larger airplanes the new plan will bring and ask that the city stay involved to support our concerns, thank you for help I appreciate all off the councils work.
56. Ponto area open space and park development
57. Take control of our coastline, bring fire rings to Ponto beach, every family should have the experience of gathering around a roaring fire on evening.
58. Cancel the Ponto development tragedy. Build a free park and keep the free beach parking there.
59. Buy the land for open space on Ponto Drive and build a park in Zone 9 that has no park even though developers paid into the park fees for 20 + years.
60. support Ponto development
61. Now that we have removed the jetty and allowed Warm Waters to wash away, and now we are planning to build on Ponto, where will locals access the beach? If 50% of responders stated the beach is the best part of Carlsbad living, why are continually squandering this gift? I know the council would live to sell Agua Hedionda to a developer too. When will there be decisions made to maintain our quality of life? Furthermore, I selected transportation because my commute time has DOUBLED in the past 5 years. The 55mph speed limit on El Camino is a joke. It takes me 2 light cycles just to cross each intersection now due to this unmitigated growth with no regard for how people will get around. I'm continually dismayed by this city.
62. Preserve the open space at Ponto. Keep traffic under control.
63. Preserve open space in zone 9
64. Money for persevering open space in zone 9 and building parks in the SW quadrant!
65. More parks and open space in Southwest Carlsbad!
66. Why another proposed hotel at Ponto? There are an abundance of hotels & stores already available ---even more than necessary. Preserving nature & some green space is more important than more concrete & businesses with "lease available" signs everywhere!
67. Prop to aid Ponto to keep it natural, as park area & natural habitat.
68. Put budget money towards Parks and Recreation, specifically Preserving Open Space in Zone 9 and Building #PontoPark in the SW Quadrant (p 84)
69. Please put budget money towards Parks and Recreation, specifically Preserving Open Space in Zone 9 and Building #PontoPark in the SW Quadrant (p 85)
70. need a park in the southwest Carlsbad post development
71. Parks in southwest Carlsbad!
72. Zone 9's lack of park and open space is sad. The SW quadrant needs more places to take kids to play, seniors to walk and get outside, and for the community to gather. A park at Ponto would be an ideal place for that and would make for a beautiful and welcoming entry into Carlsbad for locals and tourists.
73. We need a park site near Ponto Beach on the property now slated for a 5 star hotel which has not been built despite attempts by several developers over the last ten plus years.

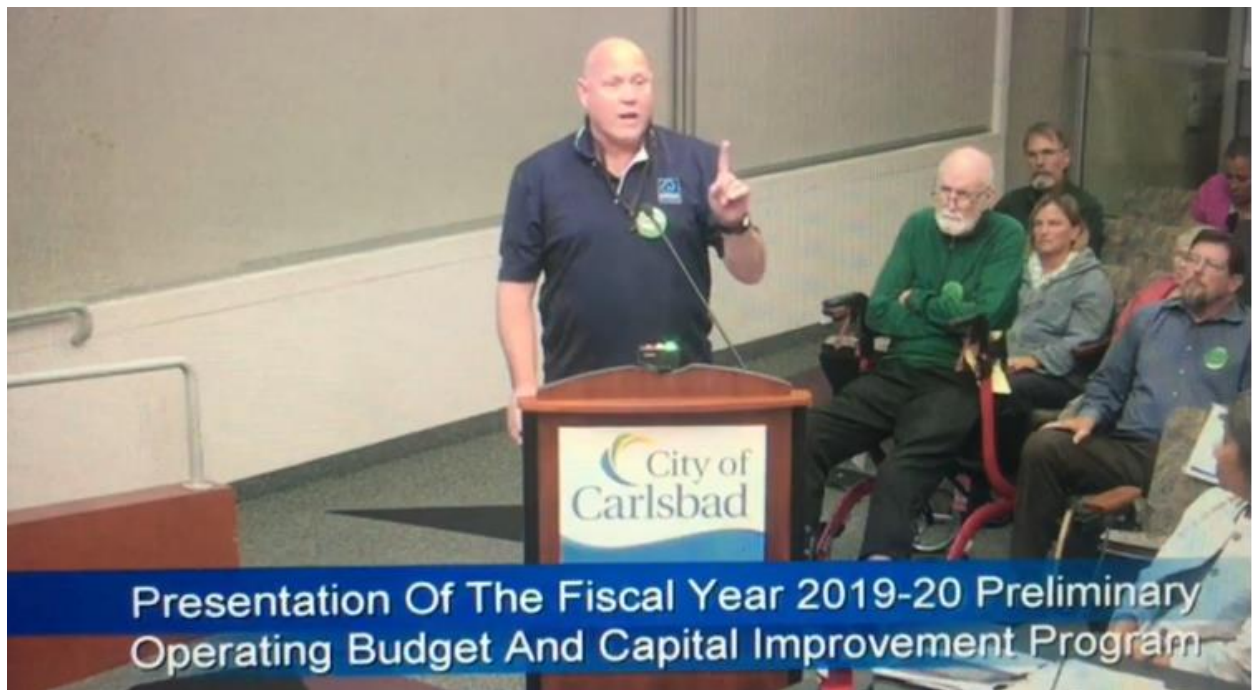
74. Please spend more on Parks and Recreation. We need to Preserve Open Space in Zone 9 and Build Ponto Park in the SW Quadrant. We do not need more homes congesting the already packed Coast Hwy. Adding sand to Ponto Beach would be nice too -too rocky!
75. I'm asking the City to put budget money towards Parks and Recreation, specifically Preserving Open Space in Zone 9 and Building #PontoPark in the SW Quadrant -this will enhance the quality of life in Carlsbad, contribute to the highest and best use, meet the requirement to have a park in this area, and make the area so desirable that it will allow raising of local tax rates (I don't believe I'm saying this). Best Regards, David Johnson
76. Put some park and playgrounds in SW Carlsbad. There are none near Ponto, yet there are open spaces, near Avenida Encinas and 101. Nothing to walk to. Thank you
77. We could really use a park in southwest Carlsbad especially the San Pacifico area. Thank you
78. Work toward filling the deficit in parks and open space in the Southwest part of Carlsbad, especially Ponto.
79. Would truly love the Ponto Beach Park! As a resident of South Carlsbad we need this!!!
80. There are no Parks in South Carlsbad. We are neglected here yet I pay very high taxes.
81. Build a Park at Ponto! Keep the open space!
82. I would like to see the city buy the Ponto property and develop it into a park.
83. Build a park at ponto
84. Appropriate development of open space and park space in the Ponto region. We are currently at huge deficit of both of these in the Ponto region
85. We are very quickly running out of open space. This is probably one of the most beautiful areas in the country, we need to preserve that beauty and maintain some open space. The open land near South Ponto beach must be preserved. There are no parks in the area, developing that area would not only add to the pollution but it would sacrifice one of the most beautiful parts of Carlsbad. Towns and Cities across the country are prioritizing open space that is so important, it is time we did that in Carlsbad. We need open space near Ponto Beach.

**A few of the many Citizens asking the City Council to budget for a much needed Ponto Coastal Park**





Presentation Of The Fiscal Year 2019-20 Preliminary Operating Budget And Capital Improvement Program



Presentation Of The Fiscal Year 2019-20 Preliminary Operating Budget And Capital Improvement Program



## Eric Lardy

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**From:** Don Christiansen <donaIdchristiansen@gmail.com>  
**Sent:** Wednesday, June 1, 2022 12:37 PM  
**To:** Growth Management Committee  
**Subject:** Citizen feedback for Carlsbad Tomorrow Committee

Fellow Carlsbad Tomorrow Committee Members,

The Carlsbad citizens I've talked with about ***Carlsbad Tomorrow Growth Management*** are much more interested in the ***future reliability of water and power***, the Carlsbad Airport, location of the new City Hall/Civic Center, the old Farmers building, ***AND especially*** the future land use of the old power plant site than (for instance) the appropriate ratio of City office space per 1,000 population.

This article was in today's San Diego Union-Tribune:

[http://enewspaper.sandiegouniontribune.com/infinity/article\\_share.aspx?guid=9761d45a-61d0-4f02-a4de-4ac92f6d661f](http://enewspaper.sandiegouniontribune.com/infinity/article_share.aspx?guid=9761d45a-61d0-4f02-a4de-4ac92f6d661f)

Under all is the land.

All the best,

Don Christiansen

***CAUTION: Do not open attachments or click on links unless you recognize the sender and know the content is safe.***

National Recreation & Park Association (NRPA) Agency Performance Review – Carlsbad Parks  
<https://www.nrpa.org/publications-research/research-papers/agency-performance-review/>

The following in quotation marks is from the NRPA Agency Performance Review. Under each quote is how Carlsbad compares with this nationwide park data base.

“The typical park and recreation agency offers one park for every 2,323 residents served, with 10.4 acres of parkland per 1,000 residents. But park and recreation agencies are as diverse as the communities that they serve, and what works well for one agency may not be best for your agency. Therefore, park and recreation professionals need data to identify the best practices to optimally serve their community.”

Carlsbad has one park for 2,797 residents with 2.95 acres of parkland per 1,000 residents.

Carlsbad is 20% below typical in providing the number of parks, and

Carlsbad is 72% below typical in providing acres of parkland.

Carlsbad data is from 2020 US Census, Carlsbad General Plan & data from new Buena Vista Reservoir Park in NW quadrant. City also counts school playgrounds as Parks, even though these are not 100% available for park use.

The NRPA Agency Performance Review also provides finer-grained data on a City’s relative performance based on population, population per square mile (aka population density), and City Park Budget size. Carlsbad’s 2020 population of 114,746 places it in the 100,000 to 250,000 category, Carlsbad’s population per square mile of 2,792.2 places it in the ‘over 2,500’ category, and Carlsbad 2022-23 Park Budget of \$2,601,669 places it in the \$1 to \$5 million budget category. NRPA data for these categories is:

<b>“Based on</b>	<b>Lower quartile</b>	<b>median</b>	<b>upper quartile</b>
<b><u>Total city population:</u></b>			
Residents per park	2,205	3,170	5,852
Acres of park/1,000 residents	4.6	8.9	16.3”

Carlsbad is:

12% better than the median in providing the number of parks per residents

67% worse than the median in providing acres of park per resident

**“Population/sq. mile (population density):**

Residents per park	1,382	2,261	3,908
Acres of park/1,000 residents	3.9	7.9	14.5”

Carlsbad is:

24% worse than the median in providing the number of parks per residents

63% worse than the median in providing acres of park per resident

**“City Park budget:**

Residents per park	1,174	1,941	4,288
Acres of park/1,000 residents	5.1	10.6	18.3”

Carlsbad is:

44% better than the median in providing the number of parks per residents

72% worse than the median in providing acres of park per resident

It is unclear in the NRPA data if the nationwide data includes and count school playgrounds as a park, (like Carlsbad does) even though school playgrounds are 100% available as parkland. The City's use of School facilities that are outside of the City Park System and City Park Budget to count as Parks may distort data comparisons.

The NRPA Agency Performance Review has no comparative data on the accessibility of Parks. The NRPA website references the Trust for Public Land's (TPL) Park Score data for Park accessibility data. The Trust for Public Land's Park Score for Carlsbad is at <https://www.tpl.org/city/carlsbad-california>. Carlsbad's TPL Park Score data indicates:

For a 10-minute walk to a Park, Carlsbad is:  
33% below the Median for the TPL's 100 ParkScore® cities:  
9% below the Median for the 14,000 cities and towns in the TPL ParkServe® database

For overall Park acreage, Carlsbad is:  
26% below the Median for the TPL's 100 ParkScore® cities:  
7% below the Median for the 14,000 cities and towns in the TPL ParkServe® database

The TPL database includes all parks within a city, including non-City parks. For instance TPL includes the State Campground as a Park; even though the Campground is a 'low-cost visitor accommodation' there is no park within the Campground. The TPL also counts restricted habitat areas within City Parks that cannot be used as parks.

The NRPA does provide information in support of park accessibility as noted in the following clips and links:

**"10-Minute Walk Campaign** NRPA, The Trust for Public Land, and the Urban Land Institute have joined forces to ensure there is a great park within a 10-minute walk of every person across America. More than 220 mayors have committed to expanding equitable park access through local policy changes, master planning efforts and increased funding." <https://www.nrpa.org/publications-research/evaluation-resource-hub/park-check/resources/>

"NRPA Park Check Principles, **Access:** Everyone deserves access to a high-quality park that is within a 10-minute walk of where they live. It is important that all members of the community, including lower-income residents, have walkable park access." <https://www.nrpa.org/publications-research/evaluation-resource-hub/park-check/principles/>

**"Ashburn, Va. (Sept. 24, 2018)** — According to a recent [report](#) published by the [National Recreation and Park Association](#) (NRPA), the majority (85 percent) of Americans support efforts, such as the [10-Minute Walk campaign](#), to ensure every person has access to a great park within a 10-minute walk of their home. Currently, 3 in 4 Americans say they live within walking distance of a local park or other recreational facility and, on average, visit their local park and recreation facilities more than twice a month. ... A [report](#) issued by NRPA — in partnership with the Center for Regional Analysis at George Mason University — demonstrates the vast economic impact of local parks nationwide. Operations and capital spending for local parks generates more than \$154 billion in economic activity and supports more than 1.1 million jobs. This is a conservative estimate that does not capture parks' other economic benefits:

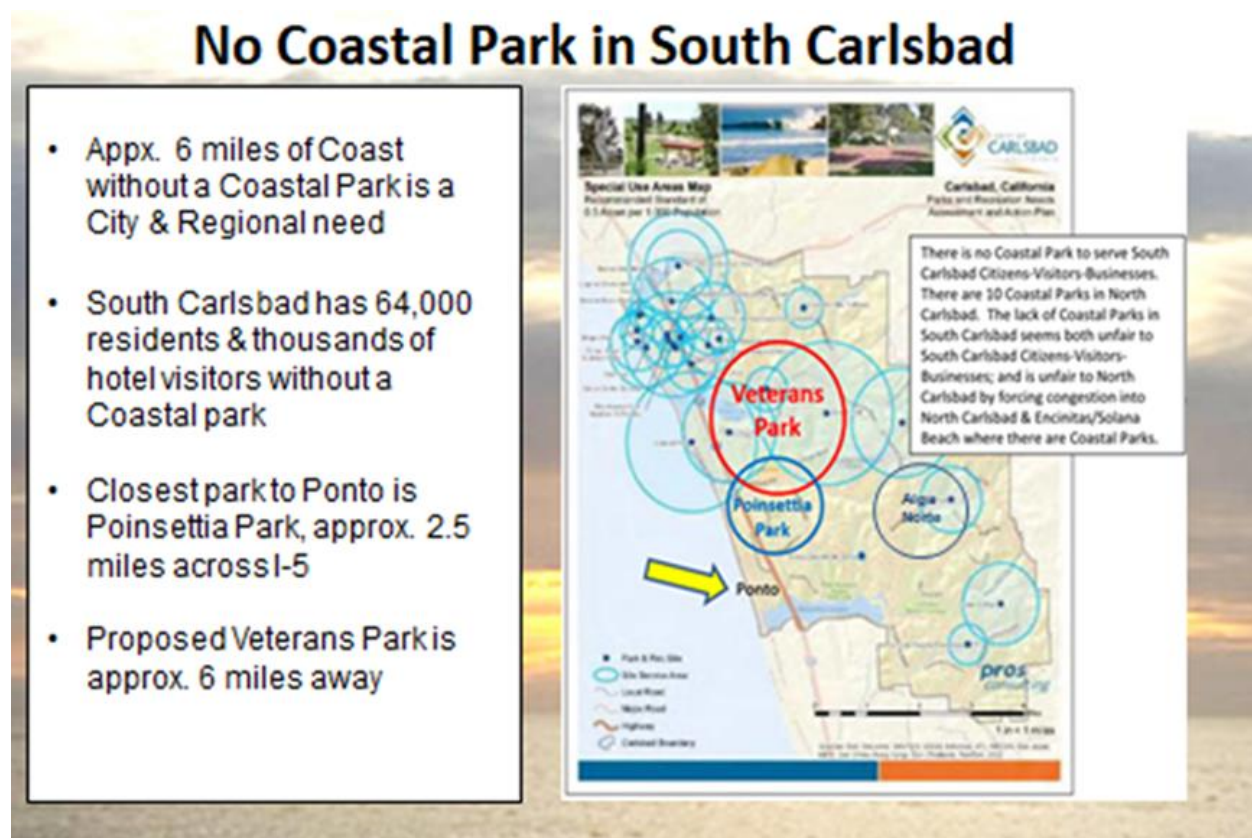
- Higher real estate values
- Health and wellness benefits
- Conservation/Resiliency benefits
- Tourism

- Economic development”

<https://www.nrpa.org/about-national-recreation-and-park-association/press-room/americans-agree-every-person-deserves-access-to-a-great-park-within-a-10-minute-walk/>

“Ashburn, Va. (Feb. 11, 2019) — As part of the [10-Minute Walk](#) campaign, which aims to address the fact that 1 in 3 Americans don’t have a park within a 10-minute walk (or half-mile) of home, the [National Recreation and Park Association](#) (NRPA), along with [The Trust for Public Land](#) (TPL) and the [Urban Land Institute](#) (ULI), has selected 10 campaign cities nationwide to receive grant funding totaling \$400,000. This funding will be used to support city planning and policy efforts that help increase access to high-quality, close-to-home parks and public green space.” <https://www.nrpa.org/about-national-recreation-and-park-association/press-room/new-grant-funding-supports-10-cities-participating-in-10-minute-walk-campaign/>

The City’s Park Master Plan (pages 86-xx) maps Park Service Areas and areas Unserved by City Parks. Following is a compilation the City parkland and the City areas Served (circled) and Unserved (outside the circles) by City Parks. This data was compiled and submitted to City in a ‘Coastal Recreation data file’ on 1/29/20 by People for Ponto Carlsbad Citizens, along with submitting over 5,000 petitions regarding many comparative shortfalls in City Parkland:





Data Sources:

<https://www.census.gov/quickfacts/fact/table/carlsbadcitycalifornia/PST045221>

<https://www.carlsbadca.gov/departments/community-development/planning/general-plan>

<https://www.carlsbadca.gov/departments/parks-recreation/parks-community-centers/parks/future-park-planning/buena-vista-reservoir-park>

<https://www.tpl.org/city/carlsbad-california>

<https://www.carlsbadca.gov/departments/parks-recreation/parks-community-centers/parks-master-plan>



March 11<sup>th</sup>, 2022

Carlsbad City Council  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008

**Re: Support creation of Ponto Park – a needed park for South Carlsbad**

Dear Mayor Hall,

The Trust for Public Land (TPL) is strongly supporting the efforts of 'People for Ponto' and thousands of Carlsbad residents to build Ponto Park in the 11-acre coastal parcel known as 'Planning Area F' in South Carlsbad. For over 40-years TPL has been designing and building parks in California and although we have world-class parks and beaches, the fact remains 3.2 million Californians don't have access to a park, and some of those Californians are residents of South Carlsbad. While the National Recreation and Park Association calls for 10-acres of park lands per 1000 residents as standard metric for healthy and vibrant cities, Carlsbad has a comparatively and relatively low park standard of only 3-acres/1,000 population and no requirement to provide accessible parks within walking distance.

And according to our own Trust for Public Land 2020-21 'City Parkscore', Carlsbad is also below national averages both providing park land acreage and in providing residents a park within a 10-minute walk.

The City of Carlsbad's Park Master Plan on pages 86-89 documents park service and park equity/inequity. Carlsbad's Park Master Plan documents that Ponto area has no park and all of South Carlsbad (over 61% of the entire city population) has no Coastal Park while . Carlsbad provides 10 City Coastal Parks (totaling over 35-acres) in North Carlsbad, while South Carlsbad has no coastal parks to serve the 64,000 residents, many of which are children. Ponto Park at 11-acre Planning Area F is the last remaining reasonable bit of vacant and currently unplanned Coastal land to provide a Coastal Park for South Carlsbad. Ponto Park would also be in the middle of a 6-mile long section of North San Diego County coastline without Coastal Park, and would help address a regional need for a Coastal Park for these 6-miles of coastline.

The CA Coastal Act has numerous policies that support the creation of Ponto Park and Coastal Recreation land use. The City of Carlsbad's history of following these CA Coastal Act policies now and over the past 40-years in its Local Coastal Program should be considered now in the City's proposed Local Coastal Program Amendment. Over the past 40-years Carlsbad and California residents have forever

lost numerous opportunities to create vital Coastal Parks and Coastal Recreation for our growing population.

In addition to the clear need for coastal parks in South Carlsbad, the citizens are overwhelmingly supporting the creation of Ponto Park in Planning area F. As you know during the past 2-years during the City Budget and Local Coastal Program Amendment processes, residents strongly demonstrated their desire that the City Council purchase and build Ponto Park. In 2019, 2020 and 2021 over 90% of citizen input expressed need was for Ponto Park, along with extensive verbal and written citizen testimony.

As COVID-19 vividly pointed out, parks are not an amenity, but a key component to human physical and mental health. Parks also provide environmental benefits and contribute to cleaner air and water, climate adaptation and social cohesion. TPL think you have a great opportunity to address equity and access to park space and improving the lives of thousands of Carlsbad residents and strongly urge you to support the building of Ponto Park for families and community.

Sincerely,

Rico Mastrodonato  
Government Relations Director