

Dear Committee Members.

I have been giving much thought to Jeff Segal's comments at our June 23rd meeting regarding the timeline of topics that were set in advance of our first committee meeting. Most specifically, the concern that we are to develop recommendations on performance standards to include in the new plan on September 22, 2022.

I understand that the topics discussed have been necessary for background and understanding but a lot of topics to get through and digest.

In the interest of brevity, I am suggesting that a short survey be sent to each member to include the following:

List each current performance standard and ask if it should: 1) stay the same 2) be updated or 3) eliminated

If the answer to the above is to be updated, list 3-5 bullet points with those ideas/comments.

Identify new performance standards. List 3-5 bullet points on what should be included at a minimum (the committee can address them in more depth at a meeting).

When a standard is being updated or a new standard is identified, the committee should keep in mind the following: 1) that there is funding availability 2) the standard aligns with the city council goals 3) there are reasonable cost vs. benefits estimates and 4) that it adheres to the recently passed CA Senate bills that focus on increasing housing (thus) affecting the metrics on all performance standards.

Thank you all for your time and effort with the committee. It is much appreciated by me and I know the residents of Carlsbad.

Kind Regards,

Mary Ryan

District 2 Committee Member

**From:** [People for Ponto Petition](#)  
**To:** [petition@peopleforponto.com](mailto:petition@peopleforponto.com)  
**Subject:** Protect Ponto Petition Letter  
**Date:** Thursday, June 16, 2022 11:15:02 PM

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Dear Carlsbad Growth Management Committee, City Council, and California Coastal Commission:

Since 2017 the City received over 5,000 petitions, written and verbal testimony regarding the need for Ponto Park and the Park and Useable Open Space unfairness at Ponto and Coastal South Carlsbad. The City staff should provide the Growth Management Committee all that citizen input since 2017.

– The City's 2017 & 2020 Sea Level Rise Report shows Ponto will lose over 32-acres of "High-priority Coastal Land Use" due to coastal erosion and flooding. (14+ acres of Coastal Recreation and 18+ acres of Campground will be lost) in Carlsbad's General Plan.

– Carlsbad's Growth Management Program and 2015 General Plan did not consider this critical 2017 & 2020 Sea Level Rise data and new actions and a new Plan are needed to address the 32+ acre loss AND increased population/visitor demand for "High-priority Coastal Land Uses".

– Carlsbad's Growth Management Program and General Plan also did not incorporate requirements for unlimited population growth that will need even more City and Coastal Recreation land – "High-priority Coastal Land Uses".

– There is a current Growth Management Program 6.6-acre City park deficit in Coastal Southwest Carlsbad, and a 30-acre Unconstrained/Useable Coastal open-space deficit in Zone 9 (Ponto area – west of I-5 and south of Poinsettia) that only gets worse as we lose 32+ acres of Coastal Open Space lands from Sea Level Rise.

Accordingly, I am making my position known and requesting that

I want the Growth Management Committee, City Council and CA Coastal Commission to:

Address the true neighborhood Park needs for Ponto (minimal 6-7 acre Park to serve minimal neighborhood needs based on Ponto buildout and City's current minimal Park Standard). Ponto Park should be an appropriately wide, viable, flat and fully useable multi-use grassed field – allow kids space to play informal sports. No thin strip of non-park land. Address loss of 32+ acres of Coastal Open Space Land from sea level rise by providing for Non-neighborhood City and State buildout-population and visitor demands for both Coastal Recreation land use and the loss of the Campground. Provide sufficient Coastal Recreation and Low-cost Visitor Accommodation land use to address the CA Coastal Act and City/State 'unlimited buildout population/visitor demand', and planned loss of current supply due to planned sea level rise.

Disclose and address 2017 CA Coastal Commission direction to City on Ponto Vision Plan and Planning Area F Existing LCP in the PCH Project. Fully address Sea Level Rise impacts consistent with CA Coastal Act & Commission relative to the State's recent requirement for unlimited City and State population growth. Document, plot the Seal Level Rise inundation and coastal erosion/bluff hazard areas in Carlsbad's General Plan including the Land Use Map, PCH Relocation Project maps, and in the PCH Project replace all 32+ acres of high-priority Coastal land use that will be lost to sea level rise and coastal erosion, and increase the supply of these high-priority Coastal land uses to address State required unlimited increases in City/State population and visitor demands.

Fully disclose and consider the 2022-June General Comparative tax-payer Costs/Benefits Analysis of Ponto Park-PCH completion-proposed PCH Relocation, to assure tax-payers (City and/or State) are getting the best and most sustainable value for their tax-payer dollars. The City should use tax-payer money wisely.

Incorporate the 5,000+ written/emailed petitions to the Council & CA Coastal Commission, and the Letters from Carlsbad visitor industry, Surfrider Foundation, and Batiquitos Lagoon Foundation.

Within the Local Facilities Management Plan Zone 9 portion fully provide the 30-acers of documented missing Unconstrained Growth Management Open Space that developers were supposed to provide. Also fully disclose and incorporate the Ponto Open Space recommendations from North County Advocates per City's lawsuit settlement.

Fully preserve or mitigate sensitive habitat areas within and adjacent to the PCH Project area.

Fully provide required storm water quality purification and dentition basins in the PCH Project before project waters and waters passing through the project area are discharged into the ocean and Batiquitos Lagoon.

I am concerned about the PCH Modification Project more than doubling traffic congestion along Coast Highway for an extremely costly walkway,

when the same walkway and other needed Coastal land uses can be provided for a fraction of the cost along existing Coast Highway. It is not appropriate to try to pass off a walkway as “linear park”.

Lastly as requested since 2017, directly engage and specifically involve the San Pacifico Community Association and Ponto Community in that portion of the City’s PCH Project of planning and design of land use in that community.

We request the above 11 citizen issues be fully addressed by the Growth Management Committee, City Council, and CA Coastal Commission regarding Park-Useable Open Space and Coastal Land Use issues and City Capital Improvement Projects at Ponto and Coastal South CarlsbadCarlsbad.

Sent from [People for Ponto](#)

**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:

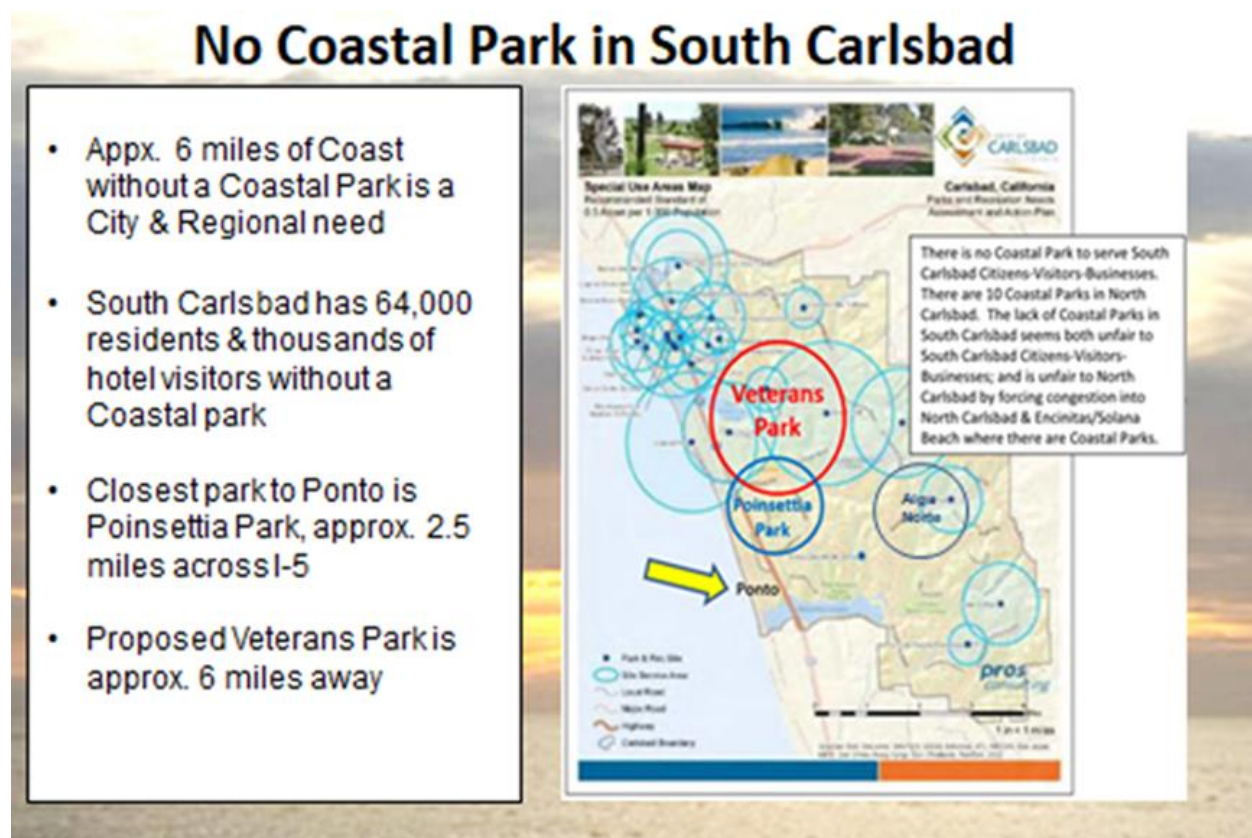
- Higher real estate values
- Health and wellness benefits
- Conservation/Resiliency benefits
- Tourism

- 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