

From: [Lance Schulte](#)
To: [Growth Management Committee](#)
Cc: [City Clerk](#)
Subject: FW: Public comment - Parkland Imbalance & resulting VMT increase - RE: Naming and shaming in California
Date: Monday, September 19, 2022 8:40:09 AM
Attachments: [image001.png](#)
[image002.png](#)
[image005.png](#)
[TPL Support for Ponto Park - 2022-3-11.pdf](#)
[CARB Dashboard - Tracking Progress - Sustainable Communities California Air Resources Board - Carlsbad - 2022 Sep 11.pdf](#)
Importance: High

Sorry Carlsbad Tomorrow Growth Management Committee, in rushing to get this out I only originally sent this Eric Lardy.
Lance

From: Lance Schulte [mailto:meyers-schulte@sbcglobal.net]
Sent: Monday, September 19, 2022 8:31 AM
To: council@carlsbadca.gov; 'Tom Frank'; 'Eric Lardy'; 'City Clerk'; 'Kyle Lancaster'; Carrie Boyle (carrie.boyle@coastal.ca.gov); 'Prahler, Erin@Coastal'; Ross, Toni@Coastal (Toni.Ross@coastal.ca.gov)
Cc: 'info@peopleforponto.com'
Subject: Public comment - Parkland Imbalance & resulting VMT increase - RE: Naming and shaming in California
Importance: High

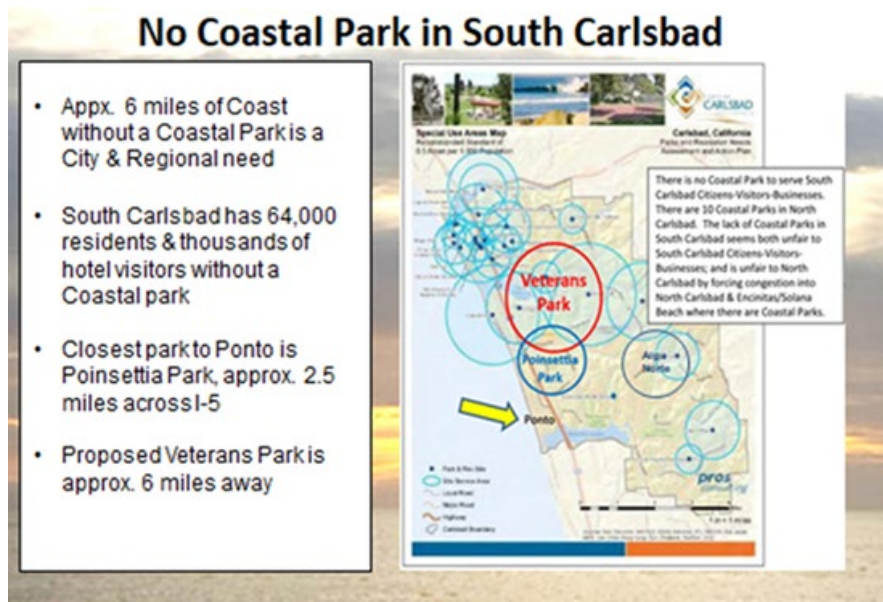
Dear City Council; Traffic, Planning and Park Commissions, Carlsbad Tomorrow Growth Management Committee; and CA Coastal Commission:

Please review and consider this email and data on regional VMT data in the Carlsbad Tomorrow Growth Management Committee's Sept 22 and future meetings on Parks, and your considerations of Carlsbad General Plan & LCPA, Growth Management Standards and Park Master Plan Updates. As has been provided in many data supported Citizen desires (and Trust for Public Land ParkScore data) and again mentioned to the CTGMC in July Carlsbad's Parkland distribution Imbalance creates multiple negative impacts to current and future generations and the environment. As mentioned to City in the "Coastal Recreation" data file and in other public input Carlsbad's Parkland Imbalance is in conflict with CA Coastal Act Policy, and as noted to you before and again in the email below Carlsbad's Parkland Imbalance is increasing Carlsbad's VMT for Park access in conflict with State law to reduce VMT. As the Trust for Public Land Parkscore data show Carlsbad is a relatively poor performer in regards to both providing Park acres and fairly distributing Park acres so more Citizens and their families can walk to Parks.

Carlsbad is also below average nationally in both providing Park acres and in fairly distributing Park acres. Carlsbad has one park for 2,797 residents with 2.95 acres of parkland per 1,000 residents. National Recreation and Park Association (NRPA) data show that Carlsbad is 20% below what is typical in providing the number of parks, and Carlsbad is 72% below what is typical in providing acres of parkland (<https://www.nrpa.org/publications-research/research-papers/agency-performance-review/>). The Trust for Public Land (TPL) also measures a City's Park performance (<https://www.tpl.org/city/carlsbad-california>). TPL data show Carlsbad total Park land acres (including counting State Park land acres) is 26% below the Median for the TPL's 100 ParkScore® cities, and 7% below the Median for the 14,000 cities and towns in the TPL ParkServe® database. The TPL also maps if a City provides/has Parks within a 10-minute walk to a Park; and Carlsbad is 33% below the Median for the TPL's 100 ParkScore® cities and 9% below the Median for the 14,000 cities and towns in the TPL ParkServe® database. This comparative information has not been publicly addressed by Council or in the 2015 General Plan Update. As noted both the Cities of Encinitas & Oceanside and many others have a 10-minute walk to Park Standard. Carlsbad does not and thus makes Carlsbad Parks less accessible and forces more VMT on Carlsbad roadways.

The CARB data so the SANDAG Regional average for Parks within walking distance is 71%, and the Statewide average is 72%. Carlsbad's Trust for Public Land Parkscore as noted above shows Carlsbad is only 50% or almost ½ worse than both the Regional and Statewide averages for walkable access to Parks. Carlsbad requires about 50% more VMT than the Region and State for Park access. This is the Imbalance People for Ponto Citizens have repeatedly shown the City but is being ignored.

Simply look at the following image from the City's own Park Service Area Maps in the Carlsbad Park Master Plan to see the unfairness, added VMT and gross Imbalance in the Land Use Plan. The blue dot is a Park and the light blue circle is that Park's service area. Even a 5-year child can see the unfairness and Imbalance.



I hope you consider this data. Our future depends on it.

Lance

From: Lance Schulte [mailto:meyers-schulte@sbcglobal.net]
Sent: Friday, September 9, 2022 9:01 AM
To: council@carlsbadca.gov; 'Tom Frank'; 'Eric Lardy'; 'City Clerk'
Subject: FW: Naming and shaming in California

Dear City Council, Traffic & Planning Commissions, and Carlsbad Tomorrow Growth Management Committee:

A former professional college of mine (and former Carlsbad citizen) who is a founding member of the New Urbanism sent me the email below. It has links to some base Regional data on issues critical to Traffic and Planning Commissions, and CTGMC regarding VMT.

How Carlsbad, and areas within Carlsbad, compare to Regional (SANDAG) VMT should likely be evaluated by the City.

The later part of my planning career I specialized in Transit Oriented Development (redevelopment) that coordinates land use and transportation planning and investment to redesign existing development to be more livable, mobile and sustainable. I hope the Commissions, CTGMC, and Council find the data helpful.

Thanks & Aloha Aina,
 Lance Schulte

From: Peter Katz [mailto:pkatz@smartgo.network]
Sent: Friday, September 9, 2022 6:15 AM
To: Peter Katz
Subject: Naming and shaming in California

To my CA friends (and a few others):

As you may know, the State of California is a leader in adopting legislation aimed at reducing VMT (vehicle-miles traveled) and hopefully the GHG (greenhouse house gas) that results from the use of gas-powered vehicles.

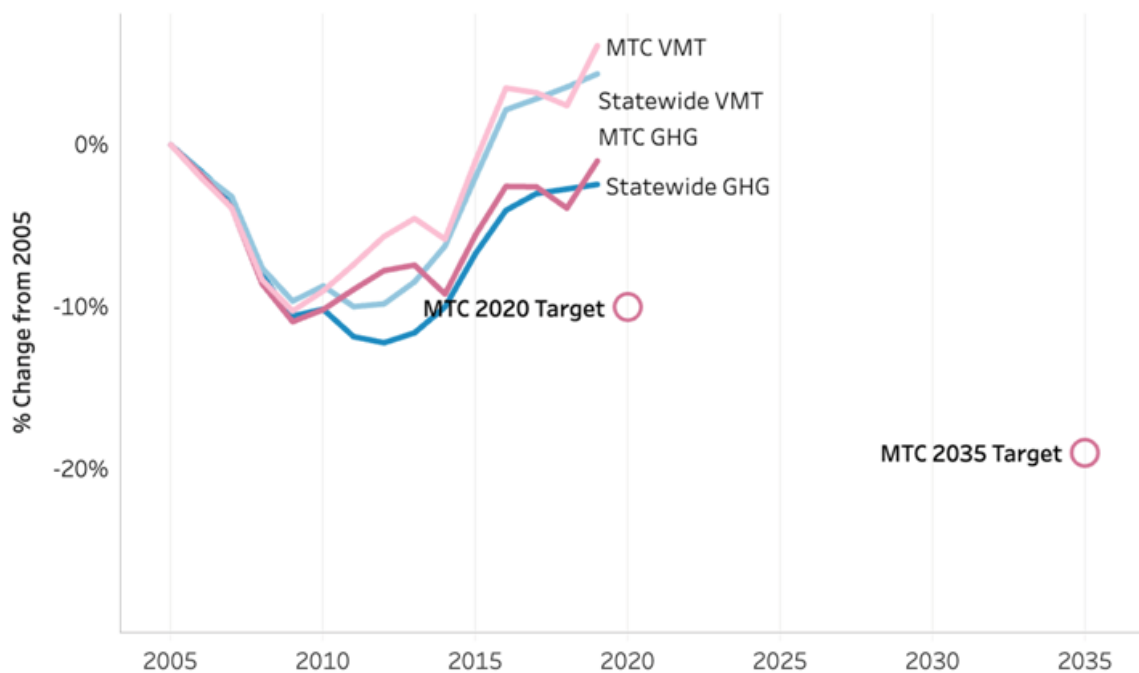
So how is the state (and its various geographic units) progressing toward stated goals? Not very

well, according to this dashboard, recently set up by California's Air Resources Board:

<https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/dashboard-tracking-progress-sustainable>

Here is a sample image from the dashboard for the SF Bay region (lines in purple):

GHG and VMT Compared to SB 375 Targets



I recommend you spend a minute with the dashboard to see how your region compares to the state average and with other regions. This comment from a CA-based colleague sums up the problem that I observed in nearly every region of the state:

"Despite California's laws and regulations around VMT/GHG reduction, macro level economic effects have more than offset reduction goals and produced trends moving in the wrong direction. Part of the challenge is that the state hasn't done enough to manage vehicle travel demand. The cost and convenience of vehicle use have not been dampened by state or regional actions associated with SB 375 or other laws."

Best;
Peter

PS: If you haven't been to SmartGO's website recently, please take a look. And don't miss the new page on our pay-per mile (PPM) auto insurance program (<https://smartgo.network/insurance-information>).

Multiple studies have shown VMT reduction of about 8% with such coverage, due mostly to behavior changes when people know they're paying for every mile that's

driven. Low mileage drivers (below 10K per year) can often save money by switching to PPM. If the approach was widely adopted in California, you'd see the lines in the chart above starting to bend downward toward the target circles, as they should be.

Maybe better consumer choices will succeed in ways that government regulation has not!

SmartGO Network

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North Bethesda, MD 20895
202/486-7160
PKatz@SmartGO.network
www.SmartGO.network



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

Dashboard - Tracking Progress - Sustainable Communities

IN THIS SECTION

CONTACT

Sustainable Communities & Climate Protection Program

Email sustainablecommunities@arb.ca.gov

Phone (800) 242-4450

Note: This beta dashboard is a draft. Do not cite.

Introduction

In 2008, the California Legislature passed the Sustainable Communities and Climate Protection Act, Senate Bill 375 (SB 375). SB 375 is a first-of-its-kind law to recognize the critical role of integrating transportation, land use, and housing decisions. The law requires each of California's 18 metropolitan planning organizations (MPOs) to include a sustainable communities strategy (SCS) in its long-range regional transportation plan. The SCS identifies strategies to meet regional greenhouse gas (GHG) emission reduction targets set by the California Air Resources Board (CARB).

In 2017, the Legislature passed Senate Bill 150 (SB 150), tasking CARB with issuing a progress report every four years that assesses progress each MPO has made in meeting the regional GHG emission reduction targets set by CARB. This dashboard showcases over two dozen data-supported metrics that CARB analyzed to support the Draft 2022 Progress Report.

How to Use This Dashboard

The purpose of this dashboard is to highlight transportation, land use, and housing metrics that CARB analyzed to support the 2022 Progress Report. Users can interact with the visualizations below to filter data or reveal additional information.

Filter Data

Use filters at the top of each visualization to narrow down data of interest. Most visualizations allow filtering by MPO region. Some visualizations also allow filtering by year.

Find Additional Information

Hover or click on a chart or graphic to reveal additional information about a given metric. For details on how a metric was calculated, see the linked methodology below each visualization.

Progress Toward SB 375 GHG Emission Reduction Targets

Changes in transportation, land use, and housing are essential to meeting the State's climate and equity goals. Despite

California’s aggressive work on vehicle technology, advancing vehicle electrification alone will not be enough to get to carbon neutrality.

CARB estimated passenger vehicle miles traveled (VMT) and associated GHG emissions compared to each MPO’s regional GHG emission reduction targets (which are set relative to a 2005 baseline). This comparison shows that California is not on track to reduce GHG emissions from personal vehicle travel under SB 375. Actual per capita GHG emissions and VMT continue to increase throughout the state. However, per capita VMT and GHG increases have slowed down since 2017.

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Select Region 1

Statewide

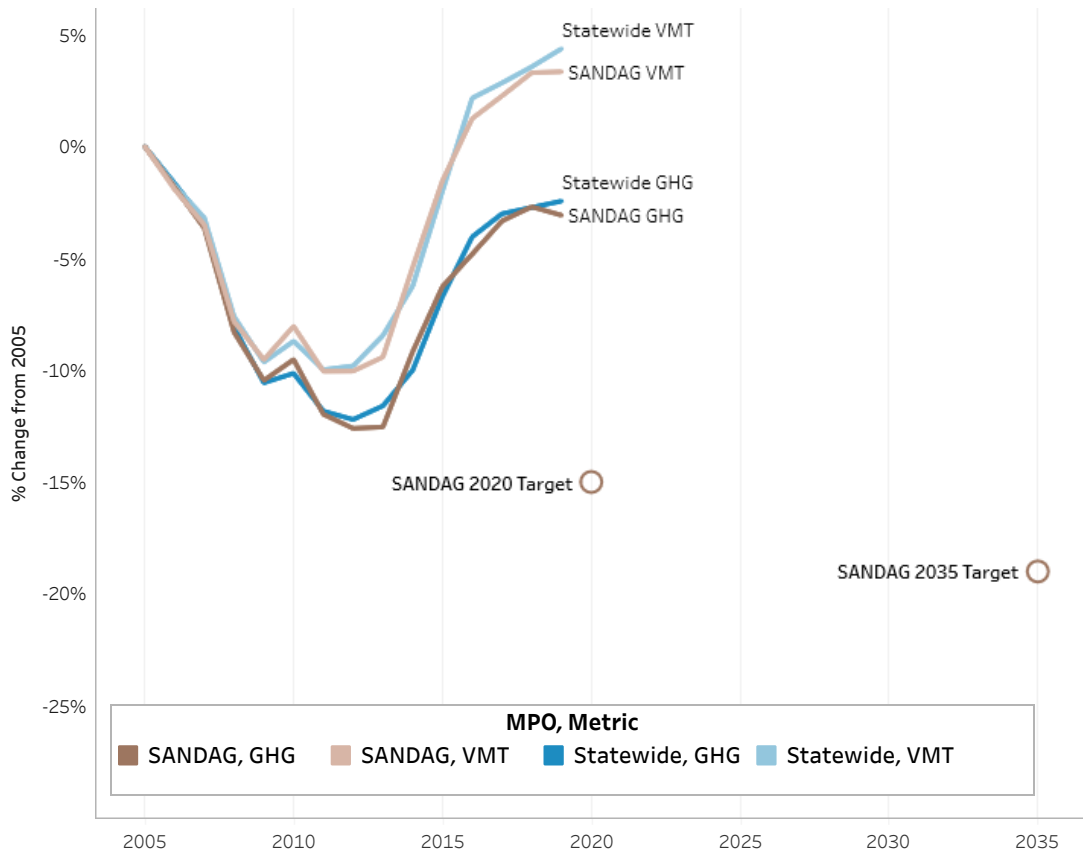
Select Region 2 (optional)

San Diego Association of Governments (S...

Select Metric

GHG
 VMT

GHG and VMT Compared to SB 375 Targets



Methodology (Appendix A)

Shifting Travel Patterns

Transportation and land use development can reduce GHG emissions by making it easier for people to get around on foot, by bike, or by transit. Travel indicators such as vehicle ownership, transit ridership, commute mode share, and commute time paint a picture of how transit, carpooling, and active transportation usage have changed relative to driving. In general, Californians continue to drive alone more and carpool less to work. Household vehicle ownership is growing, transit ridership is falling, and the small percentage of people that walk or bike to work is declining.

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Select Region 1

None

Select Region 2 (optional)

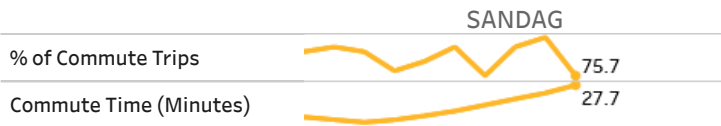
San Diego Association of Governments (SANDAG)

Select Year

2019



Drive Alone



SANDAG
76% Drive Alone



Carpool



SANDAG
9% Carpool



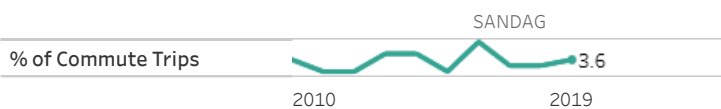
Transit



SANDAG
3% Use Transit



Walk or Bike



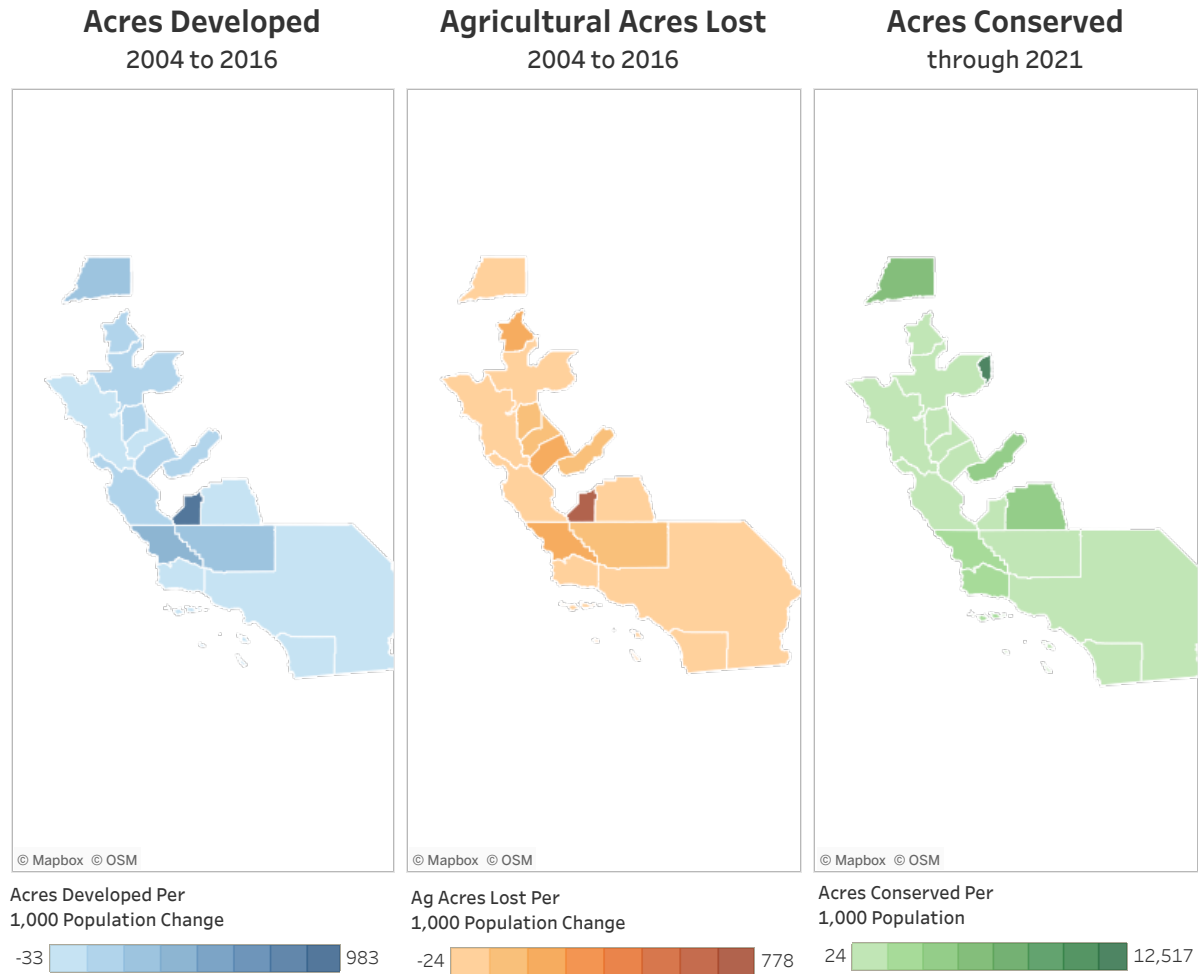
SANDAG
4% Walk or Bike



Sustainable Regional Growth

One way to reduce the need to drive long distances is to build homes, jobs, and other key destinations closer together. CARB examined changes in land use to assess whether development patterns were becoming more compact. This included evaluating changes in three types of land use: developed acres, agricultural acres, and conserved acres. Developed acres are areas that have been converted from other uses to urban land. Agricultural acres lost are areas that have been converted from agriculture to other uses. Conserved acres are areas that are protected from development of any kind. All three of these indicators vary by region, as illustrated in the maps below.

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Accessible Communities

When people live near shops, schools, parks, and transit, they can meet many of their daily needs without having to drive long distances. They may even be able to walk, bike, or ride a bus to their destination.

For each region, CARB evaluated the percentage of the population that lived within a 15-minute walk to four key destination types: park/open space, educational facilities, transit stops, and grocery stores. Unfortunately, most residents in California lack good accessibility to key destinations: less than half of the population in every region can access all four destination types by walking.

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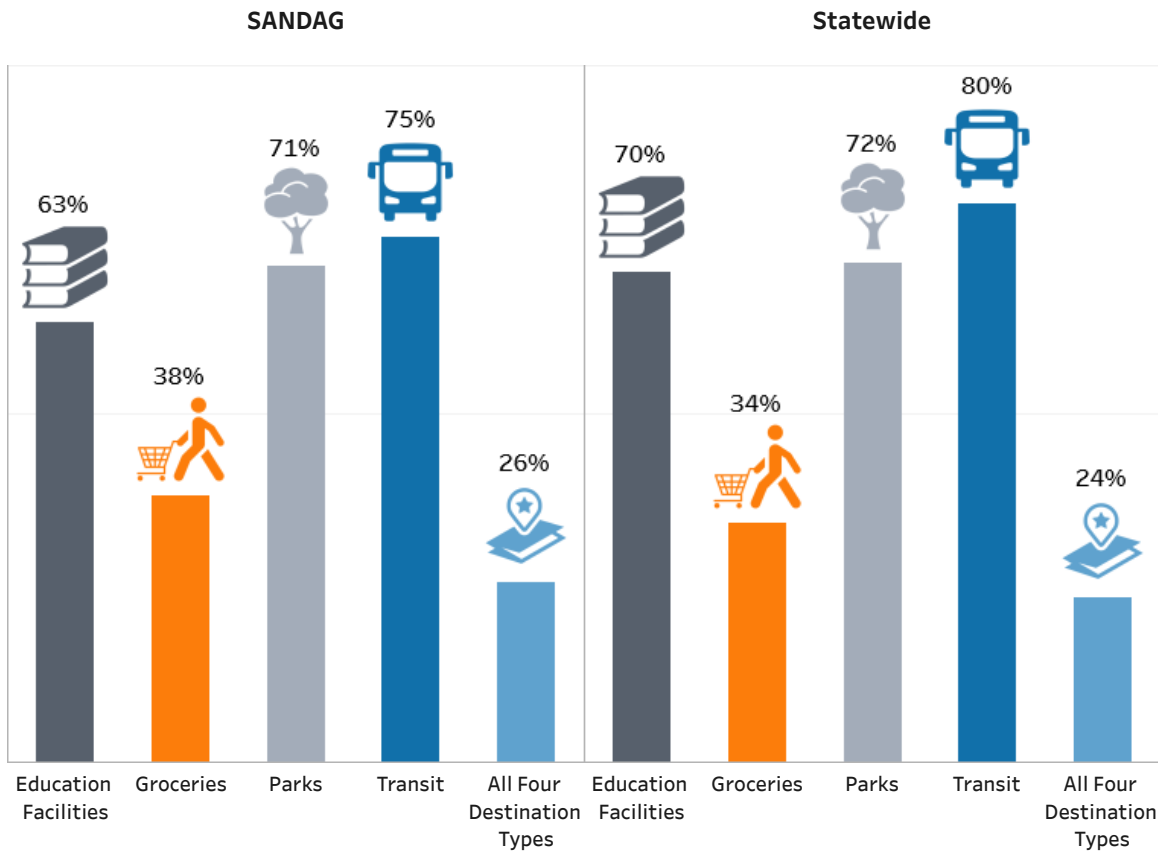
Select Region 1

Statewide (18 MPO regions combined)

Select Region 2 (optional)

San Diego Association of Governments (SANDAG)

Percent of Population With Access to Destinations by Foot



Methodology (Appendix A)

A Growing Housing Market

Housing development is an essential component for achieving SB 375 goals. For example, housing policies that promote multi-family units and equitable development can improve transit accessibility and help reduce trip length.

CARB compared permitted new housing construction to each region's housing need by income group as defined by the State Regional Housing Needs Allocation (RHNA) 5th planning cycle. Housing permitting and constructions were significantly behind regional housing allocations, especially for low-income housing.

CARB also analyzed the growth rate in single-family and multi-family housing units. The state continues to build more single-family housing than multi-family housing. However, since 2013 the growth rate of new housing has started to rebound, and the share of multi-family housing units has outpaced the percentage of single-family housing units.

Housing costs can be a substantial financial burden to predominantly low-income households. CARB analyzed the percentage of households that are overburdened by housing costs (defined as households that spend more than 35% of their income on housing). The percentage of overburdened households increased from 2010 to 2014 and slowly decreased in recent years.

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Select Region 1

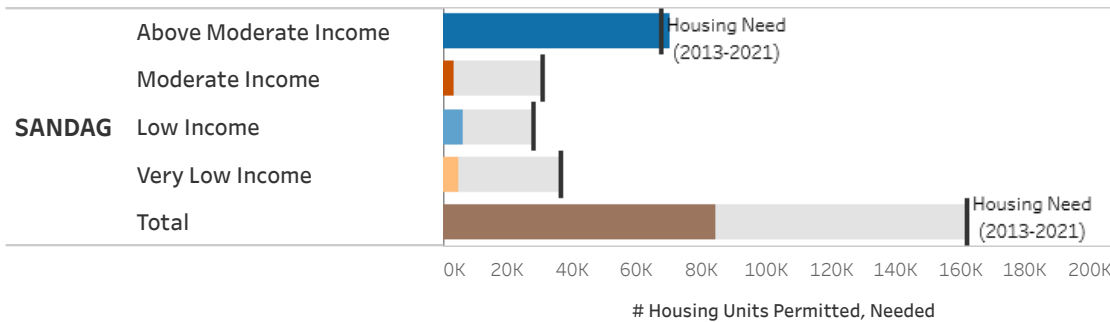
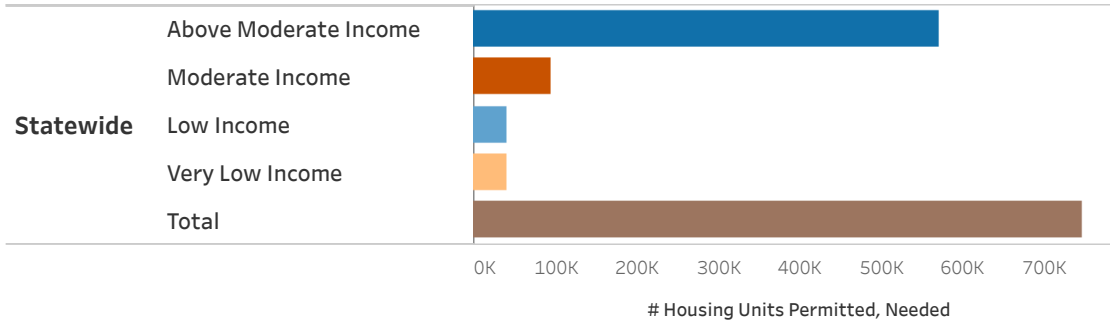
Statewide

Select Region 2 (optional)

San Diego Association of Governments (SANDAG)

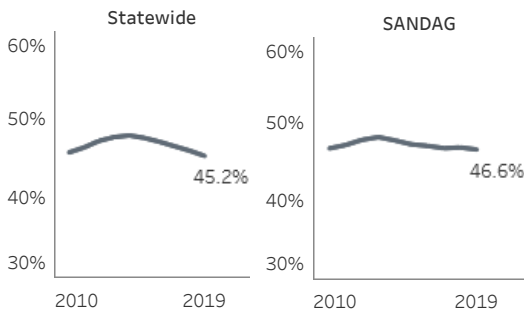
New Housing Permits and Housing Need

Regional Housing Needs Allocation - 5th Planning Cycle



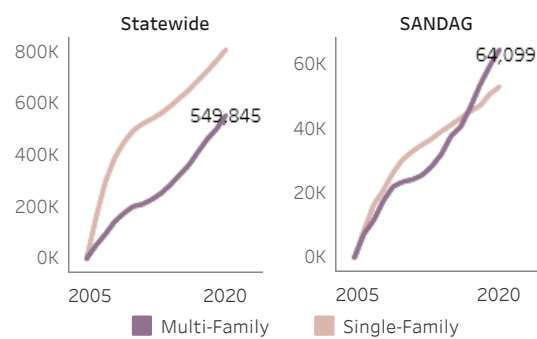
Housing Cost Burden

% Households Spending Over 35% Income on Housing



Growth in Housing Units by Type

Units Added Since 2005



Methodology (Appendix A)

Funding and Delivering Travel Choices

Funding for SCS projects comes from local, regional, state, and federal funding programs. Planned financing can explain whether a region is implementing projects and programs that reduce VMT and GHG emissions.

The charts below illustrate planned spending by mode in each region according to the MPOs most recent Regional Transportation Plan (RTP). RTPs typically cover a period of two or three decades and must cover at least 20 years. MPOs have discretionary authority over only a portion of the funds in RTPs, and that portion differs by region. Local governments, County Transportation Commissions, and transit agencies are examples of authorities with decision-making power over funds in the RTPs. Certain funding sources also have constraints attached.

With a few notable exceptions, most regions have more spending dedicated to roads than transit or active travel. Many regions continue to include significant funding for road expansion.

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Select Region 1

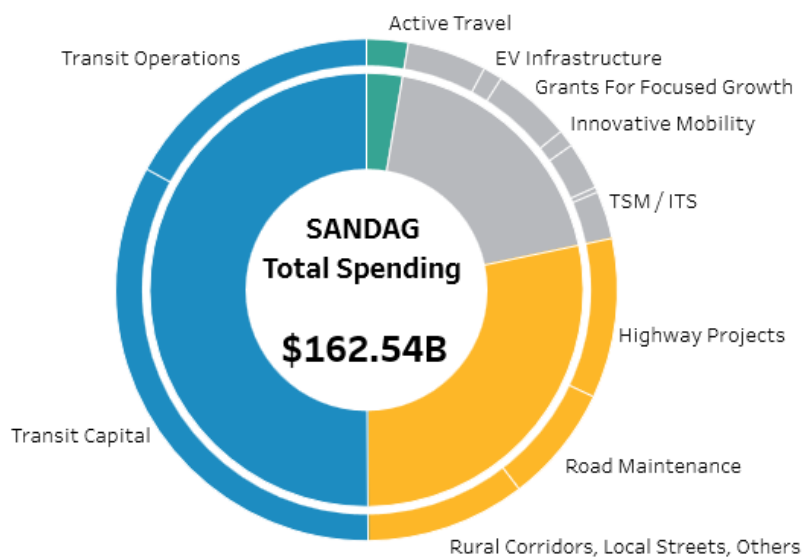
San Diego Association of Governments (SANDAG) ▼

Select Region 2 (optional)

None ▼

Regional Transportation Plan Expenditures

- Active Travel
- Other
- Roads
- Transit



Methodology (Appendix A)

Additional Information

For additional information, please see:

- Draft 2022 Progress Report for details on CARB's findings and methodology

For assistance with web accessibility, please email webaccessibility@arb.ca.gov.

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P.O. Box 2815, Sacramento, CA 95812



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March 11th, 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 polies 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

From: [Lance Schulte](#)
To: [City Clerk](#); [Growth Management Committee](#); [Michele Hardy](#); [Council Internet Email](#); [City Clerk](#); [Kyle Lancaster](#); [Eric Lardy](#); ["Smith, Darren@Parks"](#); [Homer, Sean@Parks](#); ["Moran, Gina@Parks"](#); [Boyle, Carrie@Coastal](#); ["Prahler, Erin@Coastal"](#); [Ross, Toni@Coastal](#); [Tom Frank](#)
Cc: [info@peopleforponto.com](#)
Subject: Public input to Carlsbad Tomorrow Growth Management Committee Sep 22 2022 meeting; and for LCPA, Parks Master Plan Update - Parks & Open Space at Ponto-Coastal South Carlsbad
Date: Monday, September 19, 2022 11:34:37 AM
Importance: High

Dear Carlsbad Tomorrow Growth Management Committee, Carlsbad City Council, Parks, Beach Preservation and Planning Commissions, , CA Coastal Commission and CA State Parks:

I was out this weekend so just had time to do a quick scan and noticed some obvious missing information and 'spin' in the staff 'report'. I hope the CTGMC can see this and the data 'cherry picking' and diversions to change subjects to "recreation land" and falsely try to count or hide Park shortfalls by trying to use other 'recreation' lands areas' as "Parks. Here is what I was able to quickly scan and note:

Citizen response and Input regarding 'Fact Sheet – Community Interest in Ponto Park'

Page

1 City falsely says "City can only acquire property from a willing seller" - this is false. The City can use legal powers emanate domain and condemnation to buy property for public purpose (Parks) unless the USA & California Constitutions have been amended to only allow acquisitions from 'willing sellers'. The Carlsbad City Council may have CHOSEN to adopt a formal Policy/Law (or undisclosed and hidden vote) that is constraining their authority. However that City Council CHOICE does not mean the Council can CHOOSE otherwise and use legal powers emanate domain and condemnation to buy property for public purposes.

Ironically the City Council has in fact used these emanate domain and condemnation powers on behalf of the Aviara Master Plan Developer to force an "unwilling seller" to sell a sewer line easement to the City for the Aviara Master Plan Developer.

1 'Park funding only comes from the City's General Fund' - this is false. Recently the Federal government provided the City of Carlsbad \$ 3million to help fund Veterans Park. There are both Federal and State Grants and funding for Park acquisition. The City cites many other funding sources in its CIP, and like those other funding sources for Park acquisition, the City just does not list them. Also, the City has an Park land dedication Ordinance CMC 20.44 (per CA Quimby Act) that pre-dates growth management and requires developers to give the City Free land for use as a Park to meet the Park needs for that development. In fact 20.44 is where the 3 acre per 1,000 population Park Standard came from.

1 City fails to mention we have a 'willing seller' for 14.3 acres of vacant land at Ponto. The City cites \$35 million as the price of that land. The 2-part tax-payer Cost-benefit Analysis data files sent to you should be looked at as simply buying these 14.3 acres saves tax-payers millions and is a Better Park option. P4P can show the City and you how the City could buy this property with minimal added City tax-payer cost. There are Federal and State funding (like note above) for Park acquisition. Also ALL Developers are required to give parkland for

free to the City under its Park land Dedication Ordinance 20.44 and about 1.76 acres of Ponto land would be given to the City for free to be used as a Park, or the developers would have to give the City money (pay a park-in-lieu-fee) that should be sufficient to buy 1.76 acres of Park land at Ponto.

- 1 City Budget funding is a yearly process, and future Budgets, and even most recent Council actions, will/have changed what was in prior Budgets. Buying Ponto Park actually saves taxpayer dollars as noted in the following bullets and in the 2 files sent to the CTGMC – “2022 General Comparative cost-benefits of Completing PCH-PCH Modification-Ponto Park part 1 of 2” & “City’s PCH area map w numbered notes of constraints – 2 of 2” data files. The data in these data files is from the City. As tax-payers the CTGMC should read these data files.
- 1 City wide approvals will also be needed for the "South Carlsbad Coastal Project (SCCP)" mentioned in the report. The SCCP is a \$135 million to \$150 million improvement to existing City Land and will require a City wide vote. Based on the known tax-payer Cost-Benefits of SCCP, it is not clear if votes will support this expenditure – particularly given the Citizen input the City obtained in the \$50,000 survey it conducted on the SCCP, and the Council deferring the SCCP for another year.
- 1 The staff report incompletely says 136 dwelling units are planned for one of the sites. But the report critically failed to disclose to you that Carlsbad’s General Plan Land Use Element page 2- specifically states Carlsbad’s General Plan is not adopted UNTIL the CA COASTAL COMMISSION (CCC) fully CERTIFIES the current City Proposed comprehensive Local Coastal Program Amendment (LCPA). The CCC will decide if to approve-deny-approve with modification the City Proposed LCPA in 2023. As provide the CTGMC the CCC has told the City in 2016 & 2017 that based on the Need for Coastal Recreation (i.e. Public Park) and/or Low-cost Visitor Accommodations the General Plan Land Use at Ponto may change. See the “Updated 2020 Dec 2 Planning Area F existing LCP-LUP & CCC direction to City” data file sent to the CTGMC. Read the CCC’s reasons for 2010 rejection of the Ponto Vision Plan that is the basis for the 2015 General Plan.
- 1 The 2017 Sea Level Rise Impact analysis did specifically cite both acres of land impacted and the type of land use that was impacted. I can send you the report if you want. I copied key acreage and land use from the SLR Analysis in the “Sea level rise and DUPA LUPA planned loss of Open Space at Ponto data file”. This data file also shows how the City falsely exempted Ponto developers from complying with the growth management 15% Useable Open Space Standard.
- 1 City says "South Carlsbad Coastal Project (SCCP) will Create 60 acres of available space" - this is false. The 60-acres of Space already exists. The City already owns this land. The SCCP is a \$70 million (for 1-mile Manzano to Island Way segment) + \$65 to \$80 million (for 2.3 mile Island Way to La Costa Ave segment) for a total \$135 million to \$150 million project that does not buy one single square foot of new City land. Much of the City's 60-acres is already environmentally constrained by protected Habitat so will not change anything and will continue to be unusable for people use as a Park. Parks are people and Not habitat and

Projected Habitat is for plants and animal and Not people. The City knows that most of these existing City owned 60-acres is not useable for people and is too narrow to be a Park. The largest part of the 60-acres is at 'the dip' in the 1-mile Manzano to Island Way segment. We ask the CTGMC to ask staff to show you a map and acreage count of that Segment, and how much acreage is planned for 1) roadway-bikeway-sidewalk, 2) Habitat, 3) useable land for people; and 4) the area that will be lost due to Sea Level Rise for each of these 3. What land uses are lost from SLR? Ask to see the same data for the existing configuration for the segment. Compare the data. Compare the total segment acres with the total 60-acres. There is no secured funding for the \$135 to \$150 million SCCP. The City could buy 3+ Ponto Parks for the cost of rearranging exiting features and adding a sidewalk on existing City land. The only missing feature to Complete" PCH in the two segments (total 3.3 miles) are some missing sidewalks/ped paths.

Enhancements to make PCH better and safer for bikes is a very good idea, but seems like can be done within the existing PCH configuration at a fraction of the cost. See the tax-payer cost-benefit Part 1 of 2 and Part 2 of 2 SCCP/PCH Relocation data files. SCCP will also require a citizen vote to approve funds, I am also hearing that Carlsbad citizens are not that supportive of SCCP. So is the SCCP are secured funded and 'countable solution' to the documented Park deficit at Ponto & Coastal South Carlsbad?

- 2 City says 2,074-acres or 8% of Carlsbad is Park and recreation land (page 2-7 of General Plan). This should be itemized and mapped as the numbers likely include golf courses (mostly private) and maybe Lago land and some Lagoon waters. The City is trying to inaccurately try to use private Recreation land as a public Park. The CTGMC is supposed to compare Park Standard to Park Standards. The City's Park Standard is fairly poor relative to Encinitas and Oceanside and many other cities, so you are being diverted from that fact.
- 2 432.4-acres of exiting Park & 519.7-acres of final Park based on 7/26/22 CC vote. This data should closely match the City's General Plan Land Use data that is the data base used in the "2022 Coastal Recreation data file" sent to you. Of critical importance to the CTGMC is to note the City is apparently saying that they will only provide a final 519.7-acres of Park in City. Yet as the CTGMC knows the City CANNOT plan for Buildout or a final population. So as population continues to grow there will be less and less parkland per 1,000 population. See the "CTGMC key issues and suggestions 2022-8-8" data/suggestion file sent to you.
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CTGMC, you have a heavy burden to set Carlsbad's Growth Management Program on a fair and sustainable course to accommodate unlimited future growth as required by the State of CA. This

involves fixing past errors and fixing what was unfair and setting Standard that are continually adding more parks and Open Space as Carlsbad is forced to grow.

We provided you a "CTGMC key issues and suggestions 2022-8-8" data/suggestion file that I think could help you in looking at how to set new Standards for unlimited future growth.

Thank you and Aloha Aina,
Lance

From: Lance Schulte [mailto:meyers-schulte@sbcglobal.net]

Sent: Monday, September 19, 2022 9:05 AM

To: 'City Clerk'; committee@carlsbadca.gov; 'Michele Hardy'; 'council@carlsbadca.gov'; 'City Clerk'; 'Kyle Lancaster'; 'Eric Lardy'; 'Smith, Darren@Parks'; Homer, Sean@Parks (Sean.Homer@parks.ca.gov); 'Moran, Gina@Parks'; Carrie Boyle (carrie.boyle@coastal.ca.gov); 'Prahler, Erin@Coastal'; Ross, Toni@Coastal (Toni.Ross@coastal.ca.gov); 'Tom Frank'

Cc: 'info@peopleforponto.com'

Subject: Public input to Carlsbad Tomorrow Growth Management Committee Sep 22 2022 meeting; and for LCPA, Parks Master Plan Update - Parks & Open Space at Ponto-Coastal South Carlsbad

Dear Carlsbad Tomorrow Growth Management Committee, Carlsbad City Council, Parks, Beach Preservation and Planning Commissions, , CA Coastal Commission and CA State Parks:

We ask you to please consider this email and attachments in the Sept 22nd CTGMC and subsequent Land Use, Parks and Open Space discussions by the CTGMC, LCP Amendment, PCH Relocation project, Park Master Plan Update, and development proposals at Ponto.

As always, and as we have repeatedly asked for since our initial 2017 letter to the City Council, People for Ponto Carlsbad Citizens asks for and are willing able to work with you to find the solutions for:

- the documented Park Inequity at Ponto & Coastal South Carlsbad,
- the documented missing Unconstrained Open Space at Ponto,
- the future loss of 32+ acres of Coastal Open Space (State beach and Campground) due to sea level rise,
- the needed upgrades to Carlsbad's Growth Management Program and Standards (and developer required land dedications and mitigations) to account for an Unlimited population and the need for Unlimited increases in Carlsbad Parks and Open Space to address those Unlimited populations so as to assure we maintain our quality of life,
- beneficial collaborations and donations, and
- the wiser use of tax-payer dollars to address tax-payer needs

The CTGMC and City Commission have an opportunity to do the right thing and correct the clear and obvious Park Inequity and Coastal land use Imbalance at Ponto & Coastal South Carlsbad. Please don't kick-the-can-down-the-road and fail to consider that data and your fellow Citizen desires for a better Carlsbad. P4P Carlsbad Citizens are here to help assure we sustain and enhance our quality of

life for future generations. People for Ponto love deeply Carlsbad and want to assure we leave a better Carlsbad to future generations.

Sincerely and with Aloha Aina,
Lance Schulte

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

From: [Lance Schulte](#)
To: [City Clerk](#); [Growth Management Committee](#); [Michele Hardy](#); [Council Internet Email](#); [City Clerk](#); [Kyle Lancaster](#); [Eric Lardy](#); ["Smith, Darren@Parks"](#); [Homer, Sean@Parks](#); ["Moran, Gina@Parks"](#); [Boyle, Carrie@Coastal](#); ["Prahler, Erin@Coastal"](#); [Ross, Toni@Coastal](#); [Tom Frank](#)
Cc: info@peopleforponto.com
Subject: Public input to Carlsbad Tomorrow Growth Management Committee Sep 22 2022 meeting; and for LCPA, Parks Master Plan Update - Parks & Open Space at Ponto-Coastal South Carlsbad
Date: Monday, September 19, 2022 9:04:54 AM
Attachments: [Citizen questions-input for CTGMC 2022 Sep 22.pdf](#)

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2022 Sept. 22nd Carlsbad citizens' data input & questions for the Carlsbad Tomorrow Growth Management Committee on fairness, and correcting below Standard and missing Parks & Open Space at Ponto

People for Ponto (P4P) is an all-volunteer citizen organization founded in 2017 by the 500 home San Pacifico Community Association Board. Since 2017 Citizens from all areas of Carlsbad have joined P4P in support, as have Citizens from San Diego County, visitors to Carlsbad, along with Carlsbad visitor industry, Surfrider Foundation, Batiquitos Lagoon Foundation, and the Trust for Public Land. P4P's mission is:

- *Provide information to all San Pacifico residents (and surrounding neighborhoods) on the developments.*
- *Obtain and consolidate constructive feedback from the residents. Give this feedback to the residents, developers and City so that we can have productive/timely input into the projects and their designs.*
- *Act as a strong, unified voice and with the support of our residents in upcoming Planning, Council and Coastal Commission meetings.*

In fulfilling its mission P4P has filed over 50 official Carlsbad Public Records Requests and communicated the findings. Over 5,000 petitions, hours of citizen testimony, and hundreds of pages of data have been sent to the City of Carlsbad and Council, and CA Coastal Commission and other agencies.

The main issues and desires P4P has obtained and transmitted are the same as Carlsbad Citizens have expressed for years – the need and desire for Parks and Open Space, and concerns about increasing density. Data gathered by P4P show a significant need for Park and Open Space at Ponto, and how Ponto has been developed at much higher densities than the rest of the City.

- *Ponto has a substandard amount Growth Management required Useable Open Space.*
- *South Carlsbad (62% or 2/3's of Carlsbad Citizens and families) have no Coastal Park.*
- *Ponto has unique and critical importance as the last major vacant Coastal land in South Carlsbad to provide a true City Park.*

How the Carlsbad Tomorrow Growth Management Committee and City Council, and CA Coastal Commission plan and development Ponto will forever define South Carlsbad's future.

1. Carlsbad's Park Master Plan maps show that Ponto is not served by Parks and states that Ponto is one of the areas where the Council should make new Park acquisitions. 14.3 acres of world-class vacant land is available at Ponto for a needed Park. P4P is concerned about using tax-payer dollars wisely. Initial P4P cost-benefit analysis using City data indicates that buying and developing a Park on the 14.3 acre site would save tax-payers \$8-\$32 million relative to a 2.3 mile PCH Relocation from Island Way south to La Costa Avenue. Ponto Park would also increase City land resources by 14.3 acres compared with planned City spending on the PCH Relocation that does not produce any new land. PCH Relocation is a reconfiguration of narrow strips of existing somewhat constrained City land in the PCH roadway median at a City stated tax-payer cost of \$60 - \$85 million (\$26 to \$40 million per mile). Providing about 1.6 miles of missing sidewalks in PCH costs about 1/10th the cost of PCH Relocation. The City's 2001 ERA Financial Study of PCH Relocation provides important information about the tax-payer costs and location/amount of Park land possible from PCH Relocation.
 - a. Will the Carlsbad Tomorrow Growth Management Committee (CTGMC) recommend to the City Council to study the cost/benefits/value of a Ponto Park acquisition v. PCH Relocation?
 - b. Will the CTGMC support public discussion and City Council consideration of tax payer's cost-benefit analysis of the following:
 - i. 14.3 acre Ponto Park,
 - ii. 2.3 miles of PCH Relocation, and
 - iii. Providing missing sidewalks for the 2.3 miles of PCH, and additional beach parking?

- c. Will CTGMC support making Carlsbad’s 2001 ERA Financial Study of PCH Relocation publicly available on the CTGMC website?
 - d. Will CTGMC support making P4P’s tax-payer Cost-Benefit analysis of Ponto Park, PCH Relocation and adding needed sidewalks available on the CTGMC website)?
 - e. Will CTGMC support working with Carlsbad Citizens to openly study acquiring a Ponto Park site?
2. Carlsbad’s 2017 Sea Level Rise Impact Report notes Ponto will lose over 32-acres of “High-priority Coastal Open Space Land Use” due to coastal erosion and flooding - 14+ acres of beach and 18+ acres of Campground. But Carlsbad’s 2015 General Plan and Proposed Local Coastal Program Amendment couldn’t consider 2017 Sea Level Rise data. So Carlsbad’s 2015 General Plan & proposed Coastal Land Use Plan are not replacing the 32+ acers and campground that will be lost. The following images from Carlsbad’s 2017 Sea Level Rise Impact Report show the new campground bluff edge and shoreline from sea level rise vulnerability:

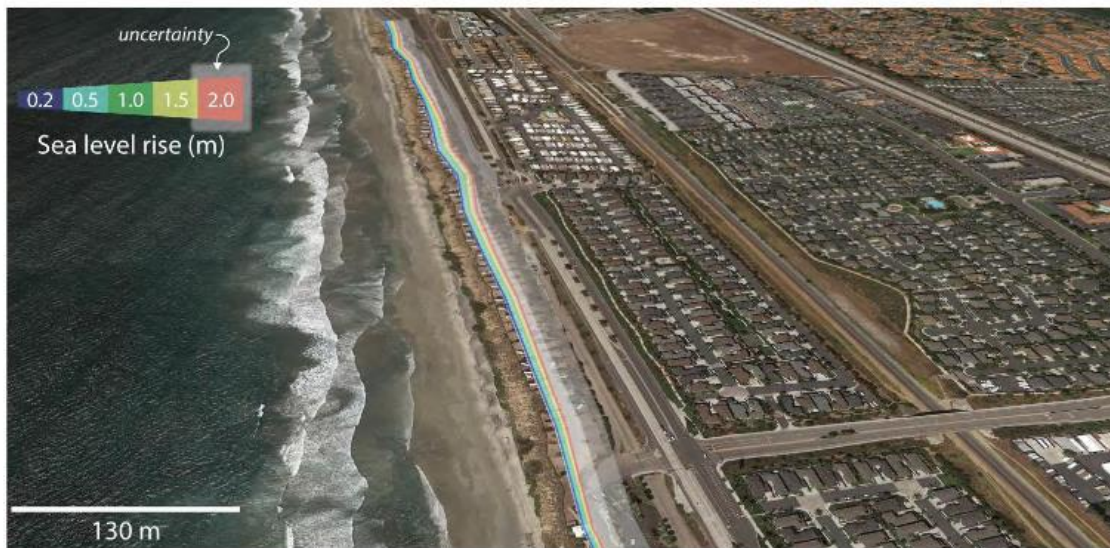


Figure 5: CoSMoS Bluff Erosion Projections by 2100
(CoSMoS-COAST 2015)

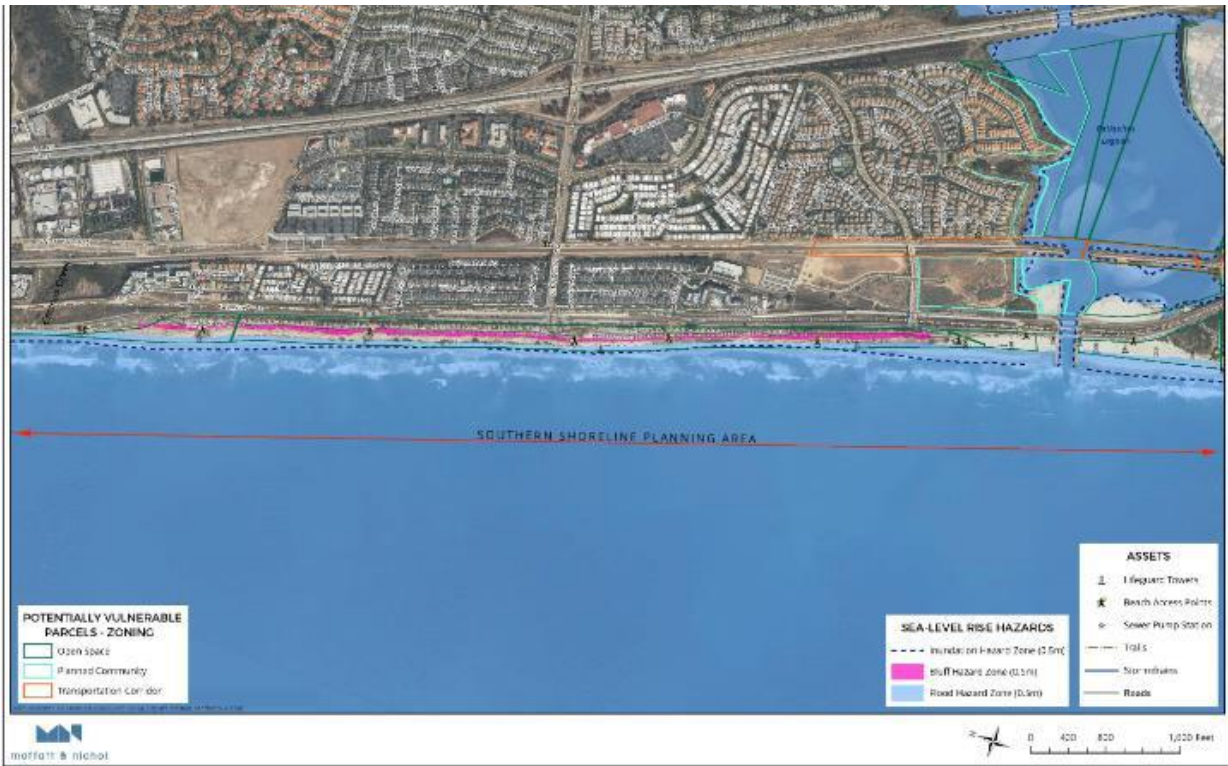
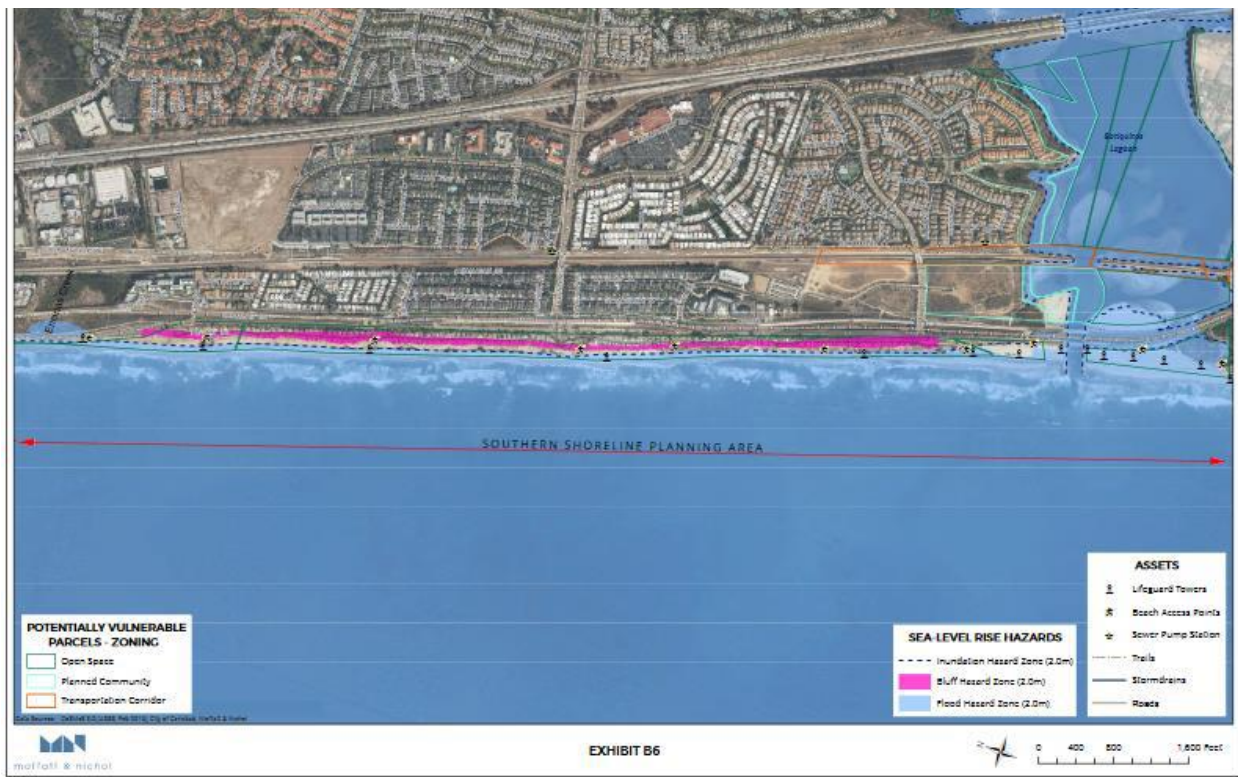
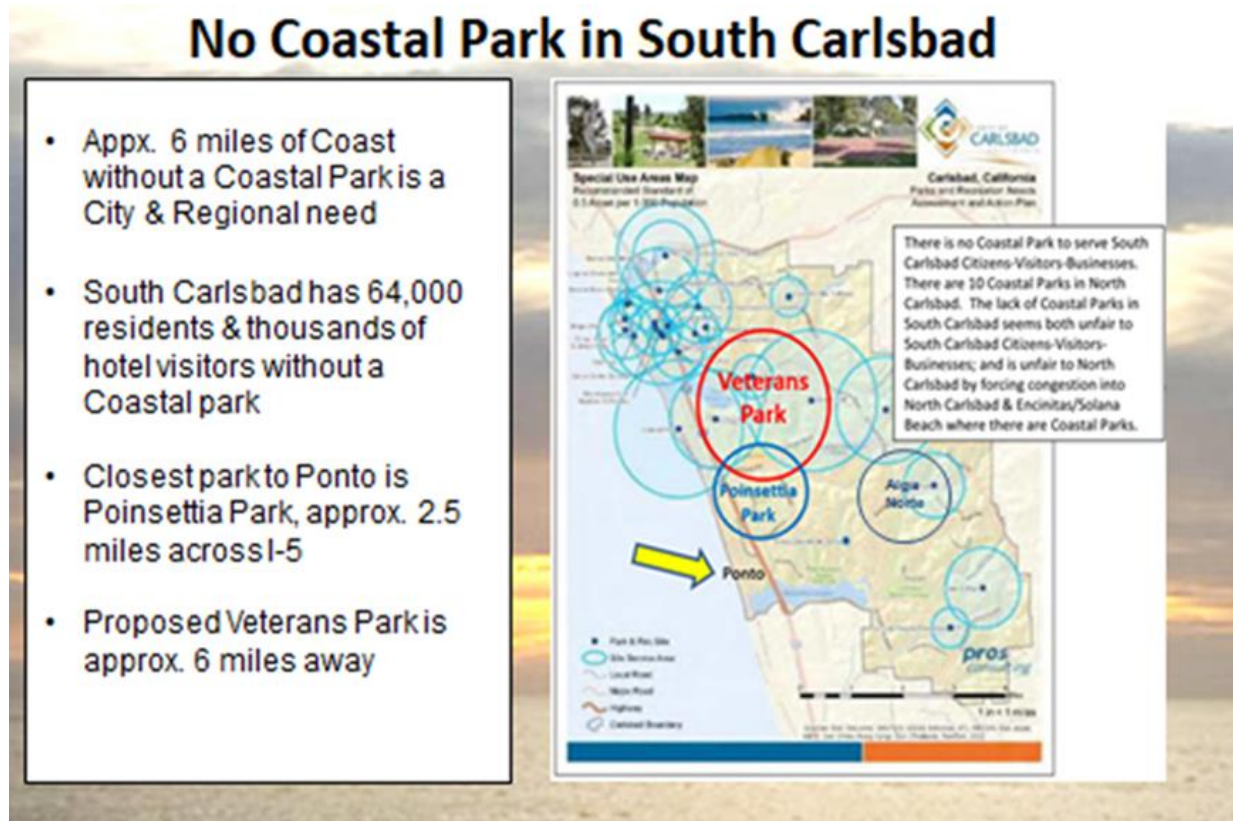


Figure 7: Southern Shoreline Planning Area – Year 2050



- a. Will CTGMC recommend to the City Council to revise the 2015 General Plan and proposed Coastal Land Use Plan for Ponto to address the impacts of sea level rise on Ponto Open Space and citizen desire for a Ponto Park?
3. 38% of Carlsbad families live in North Carlsbad. 62% of Carlsbad families live in South Carlsbad. There is significant inequity in the amount of City Parks and City Park Acres the City provides in North & South Carlsbad; and most significantly in what the City provides west of I-5 in Coastal North and South Carlsbad. In North Carlsbad there are 10 City Parks totalizing 37 acres west of I-5, or about 1 acre of Coastal City Park for each 1% of Carlsbad population or 1,147 Carlsbad residents. In South Carlsbad there are 0 (zero) City Parks totaling 0 (zero) acres of City Park west of I-5. For South Carlsbad citizens and their families this lack of equitable City Park acres is unfair. This is also unfair to North Carlsbad citizens by increasing traffic, parking and Park congestion. The following image compiled from Carlsbad's Park Master Plan shows the unfairness in City Park distribution:



- a. Will CTGMC recommend to the City Council to provide an equal, or fairer, distribution of City Park acres west of I-5 for South Carlsbad?
- b. Will CTGMC support fairness in distribution of park land?

4. Locally Carlsbad ranks relatively poorly in both providing City Park acres and distributing City Park acres so there is fair and equal access to City Parks. Carlsbad only requires 3 acres of City Park land for each 1,000 Carlsbad residents. Both the Cities of Encinitas & Oceanside require 5 acres of City Park land for each 1,000 of their residents - that is 67% more park land than Carlsbad requires. Also, Carlsbad has no requirement that City Parks be distributed to be within walking distance to homes so families can adequately access and use City Parks. Both the Cities of Encinitas & Oceanside require their City Parks to be distributed to within a 10-minute walk for all homes and families. P4P provides a 30-page '2022 Coastal Recreation data file' that documents these and more Park facts.

Carlsbad is also below average nationally in both providing Park acres and in fairly distributing Park acres. Carlsbad has one park for 2,797 residents with 2.95 acres of parkland per 1,000 residents. National Recreation and Park Association (NRPA) data show that Carlsbad is 20% below what is typical in providing the number of parks, and Carlsbad is 72% below what is typical in providing acres of parkland (<https://www.nrpa.org/publications-research/research-papers/agency-performance-review/>). The Trust for Public Land (TPL) also measures a City's Park performance (<https://www.tpl.org/city/carlsbad-california>). TPL data show Carlsbad total Park land acres (including counting State Park land acres) is 26% below the Median for the TPL's 100 ParkScore® cities, and 7% below the Median for the 14,000 cities and towns in the TPL ParkServe® database. The TPL also maps if a City provides/has Parks within a 10-minute walk to a Park; and Carlsbad is 33% below the Median for the TPL's 100 ParkScore® cities and 9% below the Median for the 14,000 cities and towns in the TPL ParkServe® database. This comparative information has not been publicly addressed by Council or in the 2015 General Plan Update.

- a. Will CTGMC recommend to City Council to change/update Carlsbad's Park Standard to at least 5 acres per 1,000 population, which would be the same as our adjacent cities of Encinitas and Oceanside?
- b. Will CTGMC recommend to City Council to update Carlsbad's Park Standard to require/plan appropriately sized City Parks to serve the population within a 10-minute walk?
- c. Will CTGMC recommend to City Council to have a policy to work with Citizens that do not have a Park within a 10-minute walk to make sure the type, size, location, features of a Park meets their needs?

5. The 2020 Census reaffirmed City-data.com data on how densely land (population per square mile of land) is currently developed in each Quadrant of Carlsbad. The Citywide average density is around 2,800 people per square mile of land. Higher density by definition indicates more people residing within a given area of land, and demanding more Park and Open Space resources. Following is rounded Quadrant-based, and Ponto Census Block, data from <https://www.city-data.com/>:

<u>City Area</u>	<u>Population per square mile</u>	<u>% more/less densely developed than Citywide average</u>
NE Quad	2,100	25.0% less dense than City
NW Quad	2,500	10.7% less dense than City

Citywide	2,800	Average density of Carlsbad
SW Quad	3,500	25.0% more dense than City
SE Quad	3,600	28.6% more dense than City
Ponto	4,100	46.4% more dense than City

- a. Will CTGMC recommend to City Council to update City policy so that more densely developed areas have an adequate and fair amount of Parks?
 - b. Will CTGMC recommend to City Council a City Park and Budget policy to prioritize Park land acquisitions in more densely populated areas?
 - c. Ponto is currently developed at over 46% higher density than the rest of the City, is not near major employment centers, and has no Parks.
 - i. Will CTGC recommend to the City Council to update City Housing and Land Use policy to avoid increasing population density in already more densely developed areas that do not have adequate Park and Useable Open Space?
6. The City allowed Ponto developers to create higher density development at Ponto than the rest of the City. **Ponto’s higher density is partially the result of the City not enforcing the City’s Growth Management Useable Open Space Standard at Ponto.** Questionably the City did not require Ponto developers in Local Facilities Management Plan Zone 9 (LFMP-9) to provide the minimum Standard of 15% of all Useable land in Zone 9 as Useable Open Space. Surrounding LFMP Zones under the same/similar situations were required to provide 15% Useable Open Space. Not complying with the Growth Management Open Space Standard explains much of why Ponto is currently developed at a density that is 46.4% higher than the City.

The following City GIS map and acreage calculations of Useable (“Outdoor Recreation”) Open Space and Constrained/Unusable (“Preservation & Natural Resources”) Open Space in LFMP-9 attests to the fact that Ponto is missing 30 acres of required Useable Open Space. This missing Useable Open Space, along with other issues in other areas of Carlsbad, is part of current litigation by North County Advocates - a separate citizens group.



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 includes the same lagoon.**
- **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 not required to comply with the 15% Useable Open Space Standard is subject to current litigation
- Below is City GIS data from this map

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

472 Acres	Total land in LFMP Zone 9 [Ponto]
<u>(197 Acres)</u>	Constrained land excluded from Growth Management (GMP) Open Space
275 Acres	Unconstrained land in LFMP Zone 9 [Ponto]
<u>X 15%</u>	GMP Minimum Unconstrained Open Space requirement
41 Acres	GMP Minimum Unconstrained Open Space required
<u>(11 Acres)</u>	GMP Open Space provided & mapped per City GIS data
30 Acres	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

Although the missing required Useable Open Space at Ponto is subject to current litigation, it is desirable for Citizens to know the CTGMC's position on City responsibility and City recognition and correction or restitution of mistakes, and willingness to work with those impacted by possible City and/or developer mistakes.

- a. Does CTGMC support responsibility and integrity in City government?
- b. Does CTGMC support discussing and correcting City mistakes?
- c. Does CTGMC support discussing and working with Carlsbad Citizens impacted by possible City mistakes to find corrections?

Thank you for receiving this citizen data input
and answering your fellow citizens' questions

From: [Lance Schulte](#)
To: [City Clerk](#); [Growth Management Committee](#); [Michele Hardy](#); [Council Internet Email](#); [City Clerk](#); [Kyle Lancaster](#); [Eric Lardy](#); ["Smith, Darren@Parks"](#); [Homer, Sean@Parks](#); ["Moran, Gina@Parks"](#); [Boyle, Carrie@Coastal](#); ["Prahler, Erin@Coastal"](#); [Ross, Toni@Coastal](#); [Tom Frank](#)
Cc: [info@peopleforponto.com](#)
Subject: Public input to Carlsbad Tomorrow Growth Management Committee Sep 22 2022 meeting; and for LCPA, Parks Master Plan Update - Parks & Open Space at Ponto-Coastal South Carlsbad
Date: Monday, September 19, 2022 11:34:37 AM
Importance: High

Dear Carlsbad Tomorrow Growth Management Committee, Carlsbad City Council, Parks, Beach Preservation and Planning Commissions, , CA Coastal Commission and CA State Parks:

I was out this weekend so just had time to do a quick scan and noticed some obvious missing information and 'spin' in the staff 'report'. I hope the CTGMC can see this and the data 'cherry picking' and diversions to change subjects to "recreation land" and falsely try to count or hide Park shortfalls by trying to use other 'recreation' lands areas' as "Parks. Here is what I was able to quickly scan and note:

Citizen response and Input regarding 'Fact Sheet – Community Interest in Ponto Park'

Page

1 City falsely says "City can only acquire property from a willing seller" - this is false. The City can use legal powers emanate domain and condemnation to buy property for public purpose (Parks) unless the USA & California Constitutions have been amended to only allow acquisitions from 'willing sellers'. The Carlsbad City Council may have CHOSEN to adopt a formal Policy/Law (or undisclosed and hidden vote) that is constraining their authority. However that City Council CHOICE does not mean the Council can CHOOSE otherwise and use legal powers emanate domain and condemnation to buy property for public purposes.

Ironically the City Council has in fact used these emanate domain and condemnation powers on behalf of the Aviara Master Plan Developer to force an "unwilling seller" to sell a sewer line easement to the City for the Aviara Master Plan Developer.

1 'Park funding only comes from the City's General Fund' - this is false. Recently the Federal government provided the City of Carlsbad \$ 3million to help fund Veterans Park. There are both Federal and State Grants and funding for Park acquisition. The City cites many other funding sources in its CIP, and like those other funding sources for Park acquisition, the City just does not list them. Also, the City has an Park land dedication Ordinance CMC 20.44 (per CA Quimby Act) that pre-dates growth management and requires developers to give the City Free land for use as a Park to meet the Park needs for that development. In fact 20.44 is where the 3 acre per 1,000 population Park Standard came from.

1 City fails to mention we have a 'willing seller' for 14.3 acres of vacant land at Ponto. The City cites \$35 million as the price of that land. The 2-part tax-payer Cost-benefit Analysis data files sent to you should be looked at as simply buying these 14.3 acres saves tax-payers millions and is a Better Park option. P4P can show the City and you how the City could buy this property with minimal added City tax-payer cost. There are Federal and State funding (like note above) for Park acquisition. Also ALL Developers are required to give parkland for

free to the City under its Park land Dedication Ordinance 20.44 and about 1.76 acres of Ponto land would be given to the City for free to be used as a Park, or the developers would have to give the City money (pay a park-in-lieu-fee) that should be sufficient to buy 1.76 acres of Park land at Ponto.

- 1 City Budget funding is a yearly process, and future Budgets, and even most recent Council actions, will/have changed what was in prior Budgets. Buying Ponto Park actually saves taxpayer dollars as noted in the following bullets and in the 2 files sent to the CTGMC – “2022 General Comparative cost-benefits of Completing PCH-PCH Modification-Ponto Park part 1 of 2” & “City’s PCH area map w numbered notes of constraints – 2 of 2” data files. The data in these data files is from the City. As tax-payers the CTGMC should read these data files.
- 1 City wide approvals will also be needed for the "South Carlsbad Coastal Project (SCCP)" mentioned in the report. The SCCP is a \$135 million to \$150 million improvement to existing City Land and will require a City wide vote. Based on the known tax-payer Cost-Benefits of SCCP, it is not clear if votes will support this expenditure – particularly given the Citizen input the City obtained in the \$50,000 survey it conducted on the SCCP, and the Council deferring the SCCP for another year.
- 1 The staff report incompletely says 136 dwelling units are planned for one of the sites. But the report critically failed to disclose to you that Carlsbad’s General Plan Land Use Element page 2- specifically states Carlsbad’s General Plan is not adopted UNTIL the CA COASTAL COMMISSION (CCC) fully CERTIFIES the current City Proposed comprehensive Local Coastal Program Amendment (LCPA). The CCC will decide if to approve-deny-approve with modification the City Proposed LCPA in 2023. As provide the CTGMC the CCC has told the City in 2016 & 2017 that based on the Need for Coastal Recreation (i.e. Public Park) and/or Low-cost Visitor Accommodations the General Plan Land Use at Ponto may change. See the “Updated 2020 Dec 2 Planning Area F existing LCP-LUP & CCC direction to City” data file sent to the CTGMC. Read the CCC’s reasons for 2010 rejection of the Ponto Vision Plan that is the basis for the 2015 General Plan.
- 1 The 2017 Sea Level Rise Impact analysis did specifically cite both acres of land impacted and the type of land use that was impacted. I can send you the report if you want. I copied key acreage and land use from the SLR Analysis in the “Sea level rise and DUPA LUPA planned loss of Open Space at Ponto data file”. This data file also shows how the City falsely exempted Ponto developers from complying with the growth management 15% Useable Open Space Standard.
- 1 City says "South Carlsbad Coastal Project (SCCP) will Create 60 acres of available space" - this is false. The 60-acres of Space already exists. The City already owns this land. The SCCP is a \$70 million (for 1-mile Manzano to Island Way segment) + \$65 to \$80 million (for 2.3 mile Island Way to La Costa Ave segment) for a total \$135 million to \$150 million project that does not buy one single square foot of new City land. Much of the City's 60-acres is already environmentally constrained by protected Habitat so will not change anything and will continue to be unusable for people use as a Park. Parks are people and Not habitat and

Projected Habitat is for plants and animal and Not people. The City knows that most of these existing City owned 60-acres is not useable for people and is too narrow to be a Park. The largest part of the 60-acres is at 'the dip' in the 1-mile Manzano to Island Way segment. We ask the CTGMC to ask staff to show you a map and acreage count of that Segment, and how much acreage is planned for 1) roadway-bikeway-sidewalk, 2) Habitat, 3) useable land for people; and 4) the area that will be lost due to Sea Level Rise for each of these 3. What land uses are lost from SLR? Ask to see the same data for the existing configuration for the segment. Compare the data. Compare the total segment acres with the total 60-acres. There is no secured funding for the \$135 to \$150 million SCCP. The City could buy 3+ Ponto Parks for the cost of rearranging exiting features and adding a sidewalk on existing City land. The only missing feature to Complete" PCH in the two segments (total 3.3 miles) are some missing sidewalks/ped paths.

Enhancements to make PCH better and safer for bikes is a very good idea, but seems like can be done within the existing PCH configuration at a fraction of the cost. See the tax-payer cost-benefit Part 1 of 2 and Part 2 of 2 SCCP/PCH Relocation data files. SCCP will also require a citizen vote to approve funds, I am also hearing that Carlsbad citizens are not that supportive of SCCP. So is the SCCP are secured funded and 'countable solution' to the documented Park deficit at Ponto & Coastal South Carlsbad?

- 2 City says 2,074-acres or 8% of Carlsbad is Park and recreation land (page 2-7 of General Plan). This should be itemized and mapped as the numbers likely include golf courses (mostly private) and maybe Lago land and some Lagoon waters. The City is trying to inaccurately try to use private Recreation land as a public Park. The CTGMC is supposed to compare Park Standard to Park Standards. The City's Park Standard is fairly poor relative to Encinitas and Oceanside and many other cities, so you are being diverted from that fact.
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Thank you and Aloha Aina,
Lance

From: Lance Schulte [mailto:meyers-schulte@sbcglobal.net]

Sent: Monday, September 19, 2022 9:05 AM

To: 'City Clerk'; committee@carlsbadca.gov; 'Michele Hardy'; 'council@carlsbadca.gov'; 'City Clerk'; 'Kyle Lancaster'; 'Eric Lardy'; 'Smith, Darren@Parks'; Homer, Sean@Parks (Sean.Homer@parks.ca.gov); 'Moran, Gina@Parks'; Carrie Boyle (carrie.boyle@coastal.ca.gov); 'Prahler, Erin@Coastal'; Ross, Toni@Coastal (Toni.Ross@coastal.ca.gov); 'Tom Frank'

Cc: 'info@peopleforponto.com'

Subject: Public input to Carlsbad Tomorrow Growth Management Committee Sep 22 2022 meeting; and for LCPA, Parks Master Plan Update - Parks & Open Space at Ponto-Coastal South Carlsbad

Dear Carlsbad Tomorrow Growth Management Committee, Carlsbad City Council, Parks, Beach Preservation and Planning Commissions, , CA Coastal Commission and CA State Parks:

We ask you to please consider this email and attachments in the Sept 22nd CTGMC and subsequent Land Use, Parks and Open Space discussions by the CTGMC, LCP Amendment, PCH Relocation project, Park Master Plan Update, and development proposals at Ponto.

As always, and as we have repeatedly asked for since our initial 2017 letter to the City Council, People for Ponto Carlsbad Citizens asks for and are willing able to work with you to find the solutions for:

- the documented Park Inequity at Ponto & Coastal South Carlsbad,
- the documented missing Unconstrained Open Space at Ponto,
- the future loss of 32+ acres of Coastal Open Space (State beach and Campground) due to sea level rise,
- the needed upgrades to Carlsbad's Growth Management Program and Standards (and developer required land dedications and mitigations) to account for an Unlimited population and the need for Unlimited increases in Carlsbad Parks and Open Space to address those Unlimited populations so as to assure we maintain our quality of life,
- beneficial collaborations and donations, and
- the wiser use of tax-payer dollars to address tax-payer needs

The CTGMC and City Commission have an opportunity to do the right thing and correct the clear and obvious Park Inequity and Coastal land use Imbalance at Ponto & Coastal South Carlsbad. Please don't kick-the-can-down-the-road and fail to consider that data and your fellow Citizen desires for a better Carlsbad. P4P Carlsbad Citizens are here to help assure we sustain and enhance our quality of

life for future generations. People for Ponto love deeply Carlsbad and want to assure we leave a better Carlsbad to future generations.

Sincerely and with Aloha Aina,
Lance Schulte

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