

From: [Harry Peacock](#)
To: [Eric Lardy](#)
Subject: Memo on my thoughts so far in developing the new Carlsbad Tomorrow document
Date: Tuesday, December 13, 2022 3:31:20 PM
Attachments: [Growth Management Issues to Address.docx](#)

Please see the attached memo from me to the Committee. I would like to have this sent out in time for tomorrow's meeting rather than me having to read this entire document as a general statement of how I think we should address various issues.

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

December 13, 2022

From: Harry Peacock, District 4 Representative, Carlsbad Tomorrow.

To: Carlsbad Tomorrow Committee.

Subject: My Thoughts on Things to Consider in Developing the New Growth Management Plan.

1. Housing vs. jobs (job types vs. housing affordability and locations). City needs to establish a real balance which will reduce traffic demand problems which has major impact on air quality and global warming. For example, city has the 2nd the greatest number of hotel rooms in San Diego County which means there are a large number of low paying "hospitality" jobs in the city. Are we focusing on ways to provide appropriate housing in the vicinity of the hotels to meet needs of those workers so they don't have to commute to their jobs? Using some of the vacant parcels on Palomar Airport Road. Also the area north of the Porsche dealership and just across the street from Poinsettia Station for affordable/multi-family housing could help address this problem as it would be near the many jobs at the car dealers, the Kaiser clinic and the several hotels north of Poinsettia Road and the Poinsettia neighborhood shopping center.

2. Traffic management through housing/business locations (i.e., balanced land use). Change land use plan to bring jobs/housing into balance and housing and park access into balance. Adopt walkability system for all future traffic planning and Traffic Demand Management.

3. Parks. Even distribution and more, than at present. Ponto is most needed location and will also help address sea level rise problem and improve air quality by reducing vehicle travel to parks. Veteran's Park, as an example, is planned to provide neighborhood park needs for South Carlsbad (62% of the population) yet this park is between 3 and 6 miles away from that population requiring excessive VMT to connect to the park. This also requires that a significant portion of the park be devoted to providing a parking lot. The current focus on "community size" parks require a significant portion of the park land to be devoted to parking. Therefore, it is not unreasonable to subtract parking areas from being included as "park" acreage and should not be counted as parks for the standard of park acreage per 1,000 people. There are several parks north of Cannon Road and west of I-5 totaling some 35 acres. There are no parks at all south of Cannon Road and west of I-5. This puts more pressure on north city beaches and parks which could be mitigated by acquiring land for a park at Ponto. Currently, lack of a park in the Ponto area is part of litigation the city is already facing. Residents of the Ponto area, specifically the San Pacifico Community have been specifically DENIED their local needed park area. The rest of the city has benefited from the development of this area as it has provided its own recreation facilities, has private streets which the city does not have to sweep, maintain or repair and has still paid the same level of park-in-lieu fees as all other residential developments. In the future, city should factor in hotel rooms and air B and Bs into the park acreage to people ratio. Also need to accept that the city no longer has control over buildout.

4. Sea Level Rise (SLR) and need to replace and add facilities for beach access, public recreation, and visitor serving commercial uses must be addressed in the new Plan.

a. City's 2010 Ponto Vision Plan (rejected by the Coastal Commission) and 2015 General Plan update did not consider SLR and how it would impact Coastal Open Space Land Use & Coastal Act "High-Priority" Coastal Open Space Land Uses at Ponto. The 2017 Assessment shows Open Space land acreage and

Land Use impact in Carlsbad will occur almost exclusively at Ponto & South Coastal Carlsbad. How will the city manage the continued growth in population, both within the city and within surrounding areas if much of the land the beach-oriented activities now take place on are no longer useable? More demand-yet less space to accommodate that demand.

b. Carlsbad Blvd. Redesign it in a manner to provide for campground site relocation, increased day use parking, using the existing-abandoned Old South Carlsbad Blvd. right-of-way N & S of Poinsettia. Result would be that 177 parking spaces would remain and 273 additional single-loaded 90-degree parking spaces & a 2-way drive aisle of + 20' for multi-use pathway or 546 additional double-loaded 90-degree spaces & 2-way drive isle. Estimated cost for 273 to 546 new parking spaces and sidewalks on both sides of Carlsbad Blvd would range from between \$5.3 million to \$7.6 million. The City's current plan AECOM of 11/26/13 is estimated to cost \$75 million per Mayor Hall. The current plan would net only 86 more parking spaces instead of between 273 and 546. With the \$70 million savings, the city can acquire the 11-acre Ponto parcel for less than \$10 million and provide much of the land needed to mitigate the loss of camp sites and beach access lost to SLR.

5. Population density should be determined by occupant capacity of any given dwelling unit. We know based on census data that this number will fluctuate over any given period of time, but the capacity that is built into each unit must be the basis for providing services and facilities. A standard to apply would appear to me to be 1.5 persons per bedroom rather than estimated population divided by estimated dwelling units. This is an obvious paradigm shift in thinking necessitated by the State mandating residential development requirements. To ignore it would be a major error in truly managing the impacts of growth. This would recognize that the term "build-out" is no longer valid for any purpose because of the State's removal of local control over develop.

6. Agree there are two different types of open space, those that are useable by people for recreation purposes and those that are unusable and undevelopable and reserved for protective habitat. Areas in various current parks are counted as park "acreage" when in fact they are unusable and are more appropriately defined as open space.

7. Open Space – habitat lands that can't be used by people should not be counted as park acreage (for example, 50% of Veteran's Park is unusable by people due to protected habitat constraints).

8. Open Space – provide addition open space when redesigning or redeveloping streetscapes into landscaped parkways that will qualify as "useable Open Space" per the GMP standard of Open Space.

9. Increase Park acreage per 1,000 population to 4-1 and add a 15-minute walk goal. Apply to city facilities only as others have use restrictions, like the golf courses and resort/hotel facilities where you have to pay to use the space and private neighborhood recreation facilities. For example, Lakeshore Gardens and San Pacifico in my part of town have private community swimming pools and San Pacifico has a basketball court, a volley ball court and two tennis courts which were paid for by the purchasers of the homes in those neighborhoods. Asking those citizens to also pay for, what is for them, redundant facilities, especially when they have no public park within over two miles of those neighborhoods is discriminatory, plain and simple.

10. Paths and trails and mobility improvements. Path and trails are not always just for recreation purposes. For example, the City failed to make a required pedestrian trail be constructed which

connects the trail system on the north side of Batiquitos Lagoon west of the freeway under the freeway connecting that trail to the trail system on the east side of the freeway. This trail could also be designed to be used by bicyclists. This would allow pedestrians and cyclists to avoid all the streets, intersections, etc. crossing I-5 at Poinsettia. In fact, the bike trail segment was supposed to be part of the current I-5 widening to the point that the design and engineering had already been done before SANDAG scaled back the I-5 widening so now the bike lane will not be built until 2050. City could build the path and SANDAG would have to eventually pay the city back for the cost-plus accrued interest until SANDAG pays back in 2050. This also begs the question of how do we make sure the city doesn't fail to live up to its regulatory role in making sure that what it is requiring is actually going to be done?

11. Have as our target that this is how we hope to see Carlsbad in the year 2050 and make assumptions on that basis.
12. Include a standard on communications. My part of the city (the far southwest corner) has poor cell phone service. Many times, workers coming to our neighborhood find they have no cell service from their cell phone provider.
13. Address how to provide adequate electric vehicle charging station access.
14. Declare that "parks" are part of "open space" and change the Parks Master Plan, etc. to so reflect what State Law states to remove the apparent current confusion over the intent of Measure C which exempts trails and open space acquisitions from the general fund voting requirement.
15. Add fire stations to the current five in the city. One to serve beaches better by being placed near the Carlsbad Blvd./Cannon Road intersection and the other in the southeast quadrant of the city which currently has the greatest number of residents who fall outside of the five-minute response standard.
16. Establish some solar power facilities to service the city so that new development does not increase demand on current fossil fuel electricity generation. Consider using developer fees to help pay for this if facilities are not mandated on site for new developments, both residential and commercial.

From: [Lance Schulte](#)
To: [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](#); [melanie@melanieforcarlsbad.com](#)
Cc: [info@peopleforponto.com](#)
Subject: Public input to the next upcoming meetings of Carlsbad Tomorrow Growth Management Committee, Carlsbad City Council and Parks and Planning Commissions - LCPA and Growth Management-Parks Master Plan Updates - Parks & Open Space
Date: Tuesday, December 13, 2022 11:37:02 AM
Attachments: [CTGMC key issues and suggestions -2022-12-6.pdf](#)

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

As the City has requested specific reference regarding public input, I ask you to please deliver to the those address this email and attachment as public input for:

1. the CTGMC's 12/15/22 meeting,
2. the next Carlsbad Council meeting,
3. the next Carlsbad Planning and Parks Commission meetings on the Parks Master Plan and Growth Management Program Updates, Ponto Planning Area F and Site 18 land use changes, and Local Coastal Program Amendments, and
4. as public input to the CCC on Carlsbad proposed Local Coastal Program, and
5. as public input to Carlsbad's proposed Local Coastal Program Amendment.

The initial version of attached file was sent to you 8/8/22. The attached updated file should replace that older file as there is new data on significant tax-payer cost savings from Pronto Park relative to PCH Relocation, and updated examples of how Coastal Open Space can be cost-effectively persevered and increased. Both Coastal Parks and Open Space are important Carlsbad and State of CA issues.

- Parks: Updated data shows that a 11.1 acre Ponto Park would now cost less \$20 million to buy and build. This is less than a City Pool Renovation. Carlsbad's Old City Council planned to spend \$65 to \$80 million in Carlsbad tax-payer dollars to address the Citywide need for a significant Coastal Park in South Carlsbad with a 2.3 mile PCH Relocation. The City identified in 2001 other pay-payer funds were highly unlikely. \$65 to \$80 million would only 'free-up' 15.8 acres of narrow PCH Median (City documented "Surplus Land Area #4 & #5"). As People for Ponto Citizens have been saying for years that Ponto Park is the better Park solution to the documented Coastal South Carlsbad Park needs – a citywide need. The CTGMC should include that citywide Park need and the logical, better and tax-payer responsible Ponto Park solution to that citywide Park need in your CTGMC recommendations to City Council.
- Open Space: Updated data shows how documented GM Open Space shortfalls can be properly and responsibly address in a collaborative citizen-based "Local Facilities Zone Useable Open Space Correction Plan" approached. Also the need to maintain the 15% GM (Useable) Open Space Standard will be critical in the future to maintain Open Space and prevent future conversion of Open Space to residential land use as part of Housing Plan updates.

For the CTGMC; Parks and Open Space are the 2 most critical/special of 6 Key Growth Management Program Update Issues and Suggestions the CTGMC should take to properly address these 6 key Growth Management Issues.

- Please read the Updated data and Suggestions.
- Please responsibly address the Growth Management issues of a citywide Park need for Coastal South Carlsbad as listed in the attached Suggestions. Include a South Carlsbad Coastal Park in your recommendations to the City Council. Acknowledge Ponto Park as the best and most tax-payer efficient solution to address that documented citywide park need.
- Please in your recommendations to City Council retain and enforce the Open Space Standard, and fix past errors made in falsely exempting certain developers in certain areas in the City from complying with the Growth Management Open Space Standard that other developers in other areas are required to provide.

Please consider this email and attachments, and know 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.

Happy holidays 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.

Following are 6 key major Growth Management Standards issues of citywide relevance that the Carlsbad Tomorrow Growth Management Committee (CTGMC) needs to act on, and citizen “Suggestions to CTGMC” on how to honestly and responsibly act on these 6 key issues in the CTGMC’s recommendations to the New City Council. This Update includes new information (pp 5-6) on the improved affordability of Ponto Park, and on how GM Open Space shortfall can be repaired. We hope the CTGMC will act honestly to make recommendations that truly and responsibly address known documented shortfalls in both Parks and GM Open Space. Responsible recommendations by the CTGMC can provide a sustainable Quality of Life to future Carlsbad generations and visitors. Only you own your recommendations.

1. The State of CA is forcing Carlsbad and all cities/counties in CA to provide for unlimited or Infinite Population and Visitor growth. So there will be an Infinite population & visitor demands for Parks, Open Space, water, and demands on our roads/transportation systems, and other Growth Management (GM) Quality of Life facilities. These infinite increases in population and visitor demand will come from high density development that requires more public Parks and Open Space to balance the high-densities. **Carlsbad’s new GM Standards will have to provide for a system of Infinite proportional increases in the supply of Parklands, Open Spaces, water, transportation facility capacity, etc. or our Quality of Life will diminish.**
 - a. Suggestions to CTGMC:
 - i. Completely restructure the General Plan, Local Coastal Program and GM Program to clearly recognize these facts and State requirements to proportionately provide public facilities to maintain/improve Carlsbad GM Quality of Life Standards for this Infinite growth of Population and Visitor demands.
 - ii. **Being a Coastal city Carlsbad has an added responsibility to proportionately maintain/improve providing High-Priority Coastal land uses (Coastal Recreation {i.e. Public Parks} and Low-cost Visitor Accommodations) needed at a regional and statewide level to address visitor needs for Coastal Recreation, access, and affordable accommodations.** Carlsbad needs to work with the State of CA Coastal Commission to completely restructure Carlsbad’s Coastal Land Use Plan to addresses the State’s requirement to provide an Infinite amount high-priority Coastal land uses for those Infinite Population and Visitor demands.
 - iii. **Trying to ignore these Infinite demands for Carlsbad’s Quality of Life facilities – like Parks and Open Spaces is a path to disaster and the ultimate degradation of Carlsbad’s Quality of Life.**
2. **Carlsbad has a huge Jobs v. Housing supply imbalance – far too many jobs around the airport for our amount of housing. This creates negative and costly land use and transportation planning distortions that radiate from the Airport Central Jobs through Carlsbad in all directions.** CA Housing law penalizes unbalanced cities like Carlsbad by requiring more housing in Carlsbad to bring jobs/housing ratio into balance. Carlsbad can correct this imbalance by 1 of 2 ways: 1) greatly increase housing supply (and thus increase the need and City expense for more GM Quality of Life facilities), or 2) more logically and cost effectively greatly decrease the amount of Jobs land use, so Carlsbad’s housing supply is in balance with jobs. These jobs will move to surrounding Cities that have more housing than jobs. **Rebalancing by reducing jobs land use creates added benefits for Carlsbad and our region by reducing Carlsbad’s peak-hour job commute traffic volumes and**

vehicle miles traveled (VMT), and by reducing the costs Carlsbad (and other cities and the region) have to pay to accommodate inter-city commute traffic. If Carlsbad reduces jobs land use will also reduce the amount of housing the State of California and SANDAG requires Carlsbad provide in its Housing Element thus reducing forcing incompatible high-density development into established neighborhoods and pressure to convert useable GM Open Space lands to housing land use.

a. Suggestions to CTGMC:

- i. **Carlsbad can logically and cost effectively balance Jobs/housing supply by updating Growth Management Policy to reduce jobs to be in balance with housing by changing some of Carlsbad's General Plan land use around the airport into several high-density residential mixed-use Villages.** The City has started some of this, but can expand this effort but has not planned creating mixed-use village environments. These high-density villages will reduce jobs and provide both high-quality and high-density (affordable) housing within walking/biking distance to the major job center and new neighborhood commercial and Park uses in the Villages.
- ii. Prioritize transportation investments in safe bike paths, walking paths between Carlsbad's Central Jobs Core around the airport and Carlsbad's housing, particularly strongly connecting these new high-density mixed-use villages with the Central Jobs Core.
- iii. Update General Plan land use and housing policy to reduce concentrations of higher-density housing except around the airport jobs core.
- iv. Recognize the central Airport jobs core is 'Carlsbad's New Urban Downtown and "Transect Plan" accordingly toward lower densities on the City periphery.

3. Although some very critical areas (such as the Coastal lands at Ponto) are still vacant and can be wisely used for critical GM Quality of Life needs, much of Carlsbad is largely developed.

Redevelopment of developed land will require creating increased supplies of Parkland, Open Spaces, transportation capacity, and other Quality of Life facilities.

a. Suggestions to CTGMC:

- i. **Completely rethink all City planning on existing vacant lands to assure that remaining vacant land is planned and being used wisely and fairly distributed to address critical Quality of Life needs in those areas, and not squandered on redundant land use.** The location of vacant land to address critical Park & Open Space needs should be preserved with land use planning.
- ii. Work with the State and CA Coastal Commission to preserve our Finite vacant Coastal lands for High-Priority Coastal Land Uses (Coastal Recreation {i.e. Public Parks} and Low-cost Visitor Accommodations and services) for the Infinite population and visitor demands both internal and external to Carlsbad that are/will be placed on them.
- iii. Fully and at the very beginning of any Carlsbad General Plan, Local Coastal Program and Growth Management Program actions going forward fully disclose, map and require consideration of the impact of future sea level rise and coastal erosion on Coastal land acres and land uses. Carlsbad has lost and will accelerate losing acres of Coastal land and High-priority Coastal Land Uses. Carlsbad must know, see, and discuss these losses BEFORE making any land use decisions in Carlsbad's Coastal Zone and any vacant Coastal Land.

4. **Carlsbad General Plan & Growth Management Plan do not provide a fair distribution of adequately sized City Parks for all Carlsbad families.** Veterans Park is a classic example. What will

be the City's largest park is only about 1-mile away from three other major City Parks (Zone 5, and the future Robinson Ranch and Hub Parks). This is a poor and unfair distribution and a misallocation City Park land resources. Saying Veterans Park is 'the park to serve SW, SE, and NE Carlsbad families' (the overwhelming major/majority funders of veterans Park) when those families are upwards of 6-miles away on major commercial arterials that kids can't logically/safely use is false and unfair. Most all the funding (developer fees) to build Veterans Park come from the SW, SE and NW Carlsbad but those areas are denied the Park the paid for. Veterans Park is inaccessible by almost all its intended users except by driving their cars and then storing their cars in parking lots on Parkland thus making less park land available for actual park use – this makes little common sense and is a great waste of tax-payer funds. This is dysfunctional along with being very unfair to families in SW, SE and NE Quadrats that are denied park acres near their homes which they funded. **Carlsbad's Park Master Plan maps 'Park Service' areas of existing known Park Inequity or Unfairness (dysfunction), to show where new City Park investments should be made (See City map image with notes below).**

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

The Trust for Public Land provides a Park-Score to compare both a City's amount of park acres and the 'fairness' of access (within a 10-minute walk) to parks. **Carlsbad is below national averages in both park acres and fair access to parks. Carlsbad is also well below what our adjacent Coastal cities of Encinitas and Oceanside provide. Carlsbad only requires 3 acres of Park land per 1,000 population, while Encinitas and Oceans require 5 acres - 67% more than Carlsbad – of parkland. Also, Encinitas and Oceanside require parks to be within a 10-minute walk to their citizens and families. Carlsbad has no such requirement.**

a. Suggestions to CTGMC:

Carlsbad should change its General Plan, Parks and Growth Management Standards and CMC 20.44 to:

- i. **Be Above Average Nationally in both providing park acreage and in locating adequate park acreage to be within a 10-minute walk to all neighborhoods.**
 - ii. **Raise its minimum park acreage standard to 5 acres per 1,000 population, versus the current low 3 acres per 1,000. Carlsbad should be at least as good as Encinitas and Oceanside in requiring 5 acres, not 40% below what our adjacent Cities require/provide.**
 - iii. **Raise its park location standard to require an adequately sized park be provided to serve the neighborhood population within a 10-minute walk for all neighborhoods.**
 - iv. **Prioritize City Policy and Park Budgets and investments to achieve park fairness in 'Park Unserved areas' identified by Carlsbad's Park Master Plan.**
 - v. **Per Carlsbad's Municipal Code Chapter 20.44- DEDICATION OF LAND FOR RECREATIONAL FACILITIES to require developers in 'Park Unserved areas' and in areas that do not have an adequately sized (5 acres per 1,000 population) park within a 10-minute walk to provide their developments required Park land acre dedication in actual Park land within a 10-minute walk to their development.**
 - vi. **Update the City's Park-in-lieu fee to assure the fee is adequate to actually buy the amount of park land a developer is to provide within a 10-minute walk of their development. The City's current 'Park-in-lieu-fee' is far too low and inadequate to actually buy land in area surrounding the proposed development.**
 - vii. **Only allow developers to pay a Park-in-lieu-fee where there is an adequately sized park (provide 5 acres per 1,000 population) within a 10-minute walk of their development, and growth management planned future development in that area will not require more park land to provide 5 acres per 1,000 population) within a 10-minute walk.**
 - viii. **Consider updating Park policy to provide more multi-use flexibility in park land acres and development on Parks. Many Carlsbad Park acres are developed/dedicated to a single-purpose use, and unavailable for other park uses.**
 - ix. **Consider eliminating car parking lots from land that can be counted as parkland; or by significantly limiting park land used for parking to around 5%.**
 - x. **Eliminate the counting of 'GM Constrained and Unusable land' and Protected Endangered Species Habitat land as Park land. GM Constrained/Unusable lands are undevelopable. Protected Habitat lands are by definition not useable for development by people. Habitat is dedicated for plants and animals. Parks are open spaces dedicated intended for people. Parkland calculations should exclude Unusable lands and Protected Habitat lands and only count 100% people Useable land as Park land. Where Park land abuts Habitat land a sufficient buffer space shall be provided to prevent people mixing with animals (ex. Rattlesnakes, etc.) and animals from people (habitat disturbance or destruction). This buffer area should not be counted as Park or Habitat acres, but as natural/developed buffer open space acres, and can be counted as part of the City's 15% Growth Management 'Aesthetic open Space'.**
5. **Carlsbad's Coast is the most, if not the most, important feature of Carlsbad; and is consistently identified by citizens and businesses and our Community Vision. Carlsbad's Coastal Parks (west of the I-5 corridor) are grossly unfairly distributed. Carlsbad's Coastal Parks do not fairly match the**

locational needs of the population. North Carlsbad that is 38% of Carlsbad's population and has 10 Coastal Parks totaling 37+ acres in size. South Carlsbad that is 62% of Carlsbad's population has 0 [ZERO] Coastal Parks totaling 0 [ZERO] acres. Again, Carlsbad's Park Master Plan maps this citywide unfairness (dots show park locations and circles show the area served by each park) and says that the City should look at buying and building New Parks in these areas that are unserved by City Parks (are not covered by a circle). The GM Update should correct this citywide unfair distribution of City Parks by making plans for new Park purchases to create City Parks in these unserved areas of Park Inequity.

To address citywide Coastal Park unfairness the current City Council wants to spend \$60-85 million in Carlsbad tax-payer funds to Relocate 2.3 miles of constrained Pacific Coast Highway median to try to make some of the narrow PCH median 'useable' by people. 2001 and 2013 City PCH Relocation studies identified only a small amount of 'people-useable acres' would be created next to PCH. The \$60-85 million tax-payer cost (\$26-37 million per mile) does NOT add one single square foot of new City land, it only inefficiently rearranges a small amount PCH median. The City can most tax-payer cost effectively provide needed sidewalks and bike improvements along the outside edges of PCH without PCH Relocation. The City's 2001 PCH Relocation Financial Study and 2013 PCH Relocation Design both indicated minimal useable land could be achieved by Relocation, and that the very high tax-payer cost to do so would be very difficult to fund. The City has known for well over 20-years that PCH Relocation is a high-cost and a poor solution to address the Citywide Coastal Park unfairness in South Carlsbad.

However, a **better and far less costly solution to correct Citywide Coastal Park unfairness and provide a much needed South Carlsbad Coastal Park is to simply buy currently vacant land that is for sale.** The City did this (although the City actually bought existing homes) when it expanded Pine Park. **Carlsbad tax-payers have used the City's own data to compare the tax-payer Cost/Benefits of simply purchasing vacant land v. trying to rearrange existing City owned land at PCH. Simply buying vacant land saves tax-payers saves tax-payers over \$32.7 to \$7.7 million.** Please read the following data files:

- 2022-June General Comparative tax-payer Costs/Benefits of Completing PCH, 2.3 miles of PCH Modification (Island Way to La Costa Ave.), and 14.3 acre Ponto Park (Kam Sang) to address planned loss of 30+ acres of Coastal Open Space Land Use at Ponto in South Carlsbad: Part 1 of 2.
- City's PCH Modification Proposal Area Map with notes on usability Constraints and Issues: P4P Input: Part 2 of 2
- The most recent (9/19/22) land sale of 11.1 acre Ponto Planning Area F was less than \$8 million (less than \$706,000 per acre).
- **Buying and developing this 11.1 acre Ponto Park would cost less than \$20 million assuming a 10% profit to the new land-owner, and \$1 million per acre park construction cost like our newest Buena Vista Reservoir Park.** The cost to help correct a Citywide Coastal Park unfairness by simply buying & building a much needed **11.1 acre Ponto Coastal Park would cost tax-payers less than the recently approved Measure J City Monroe Street Pool Renovation.** Investing less than \$20 million (\$1.8 million per acre) to buy and build an 11.1 acre Ponto Coastal Park is a great tax-payer value v. \$65-80 million in tax-payer funds to rearrange 15.8 acres of narrow strips of constrained PCH median (City documented "Surplus Land Area #4 &5") for some minimal people use at a tax-payer cost of \$4-5 million per acre. **The overall and per acre costs of buying/building Ponto Park are over 2 to 3 times better value for tax-payers than PCH Relocation/rearrangement.**

- The City Council could/can buy land for Open Space (Parks are the most useable of the City's 4 Open Space categories) under voter approved Prop C Open Space land acquisition authority. **The City has been advised to buy Ponto Park under Prop C per the City's settlement of a Growth Management law suit.**

The Park and Coastal Park Inequity at Ponto and Coastal South Carlsbad is clearly a citywide issue. Park and Coastal Park Inequity at Ponto and Coastal South Carlsbad as it is unfair to the vast majority of Carlsbad citizens and their families as 62% of Carlsbad is in South Carlsbad. Park and Coastal Park Inequity at Ponto and Coastal South Carlsbad is unfair to our major Visitor serving industries (and tax generators) in South Carlsbad. Park and Coastal Park Inequity at Ponto and Coastal South Carlsbad are clearly inconsistent with the CA Coastal Act, Carlsbad's Community Vision, and common sense. The Coastal South Carlsbad Park Inequity is also unfair to North Carlsbad because South Carlsbad's Coastal Park demand is being forced into Coastal North Carlsbad and congesting those parks, and adding to Coastal North Carlsbad traffic and parking impacts. It also increases greenhouse gases and VMT as it forces longer vehicle trips.

a. Suggestions to CTGMC:

- i. 11.1 acre Ponto Planning Area F has a specific Local Coastal Program Land Use Policy that says The City of Carlsbad must for the Ponto Area LCP 'Consider and Document the need for Coastal Recreation (i.e. Public Park) and or Low-Cost Visitor Accommodations west of the railroad tracks (at Ponto) prior to any Land Use change. **The discussion of Parks by the CTGMC is such a situation that requires the CTGMC to consider this adopted LCP Land Use Policies. Official public records requests have shown the City never followed this LCP Land Use Policy Requirement during the 2005 Ponto Vision Plan and 2015 General Plan Update, and in 2010 the CA Coastal Commission rejected the Ponto Vision Plan and told the City in 2017 that that land uses at Ponto could change based on the need for Coastal Recreation and/or Low Cost Visitor Accommodations.** The Mello II LCP that covers most of Carlsbad's Coastal Zone also has Land Use Policy 6.2 for the City to consider a major park in the Batiquitos (Ponto/South Carlsbad) area. The City has only implemented 1/6 to 1/3 of this policy. **The CTGMC should fully evaluate the citywide/South Carlsbad and local Ponto need for Coastal Parks as required by the City's adopted LCPs and CA Coastal Act.**
- ii. Carlsbad's 2015 General Plan Update and Growth Management Plan (GMP) did not, and was not updated to, consider the 2017 Sea Level Rise (SLR) Impact report showing the loss/impact on 32+ acres of Carlsbad's Coastal Land Use acreage in South Carlsbad – primarily Open Space Land Use (beach and Campground). **Both the General Plan (and Local Coastal Program Land Use Plan) and GMP should be updated to account for the loss and replacement of these 32+ acres of high-priority Coastal Open Space Land Use due to SLR.** The updates and the CTGMC should use the newest CA Coastal Commission SLR Guidelines/science, not the old guidelines used in 2017. Carlsbad's LCP and CA Coastal Act Land Use Polies call for 'upland relocation' to replace the SLR loss of high-priority Coastal Land Uses.
- iii. **The availability over the past several years of the last two sufficiently sized vacant lands suitable for a Ponto/South Carlsbad Coastal Park is a citywide issue. If these last two vacant lands are lost to development forever future generations will have lost the last opportunity for the needed South Carlsbad Coastal Park.** The 5/3/22 Citizen requests for the City to jointly study acquisition of one or both these last vacant lands for a needed (and only possible) true and meaningful Coastal Park for

South Carlsbad should be recommended by the CTGMC. **The CTGMC should recommend Carlsbad’s GMP be updated to incorporate Parkland acquisition of these last opportunities to provide the needed Coastal Park for South Carlsbad.**

6. Carlsbad Growth Management Open Space Standard is that 15% of all the Useable (unconstrained and fully buildable) areas is to be preserved as Useable Open Space, and that all the 25 Local Facility Management Plans (LFMP) show how that 15% is provided. The City says:

OPEN SPACE

A. Performance Standard

Fifteen percent of the total land area in the Local Facility Management Zone (LFMZ) exclusive of environmentally constrained non-developable land must be set aside for permanent open space and must be available concurrent with development.

Yet the City has mapped and documented that this 15% Useable Open Space Performance Standard was not complied with. The City also acknowledges that without changes to current City planning the 15% Useable Open Space Performance Standard will never be complied with. The City acknowledges that only 13% has/will under current plans ever be provided. This missing 2% equals 501 acers of lost GM Open Space the GMP promised citizens. **Carlsbad law the Growth Management Ordinance 21.90, and section ‘21.90.130 Implementation of facilities and improvements requirements’; provide guidance on how non-compliance with a Performance Standards is to be handled.**

a. Suggestions to CTGMC:

- i. Retain the GM Open Space Standard of 15% of all unconstrained and developable land is maintained as Open Space. If the City removes the Open Space Standard, it will allow and encourage land use changes to remove GM Open Space and replace with development.
- ii. **The CTGMC should make a recommendation that an inventory of all 25 LFMP Zones be conducted and an inventory of each LFMP Zones provision of at least 15% Useable Open Space shall be compiled. No LFMP Zone shall be allowed to be “exempt” from this inventory.** The City’s computerized GIS mapping system makes it easy and clear as shown in the following City GIS map for LFMP Zone 9 (aka Ponto).



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

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

- iii. In instances like LFMP Zone 9 (above image) that clearly did not provide at least 15% Useable Open Space and/or were falsely “exempted” the CTGMC should recommend that a **Local Facilities Zone Useable Open Space Correction Plan** shall be developed that explores the GM Open Space use/reuse of City land, land use planning requirements, and/or possible acquisitions of remaining vacant land acres to make up for any shortfall in meeting the 15% Useable Open Space in that a Zone. An example of this in LFMP Zone 9 is that the City’s regional Rail Trail will convert 2-lanes of almost all of Avenida Encinas to wider buffered bike lanes and an adequate portion of the converted 2 vehicle lanes can be landscaped (v. just painting strips as a buffer) to provide a safer/better bike lane buffer within a GM compliant Open Space. 2 vehicle lanes in Windrose Circle could also be similarly landscaped and converted to GM complaint Open Space. This is just one example of a cost-effective means to add GM Open Space that developers were falsely allowed to remove.
- iv. A **Local Facilities Zone Useable Open Space Correction Plan** should involve a Citizens Advisory Committee composed of citizens within the impacted Zone and appointed by the Council Members representing the Zone, and a representative of each vacant land owner over of over 1-acre in size.
- v. Consistent with the Growth Management Ordinance land use changes and development applications within a **Local Facilities Zone Useable Open Space Correction Plan** Zone shall be deferred until the applications can considered with (or after adoption of) a **Local Facilities Zone Useable Open Space Correction Plan**.

From: [Don Christiansen](#)
To: [Growth Management Committee](#)
Subject: Colorado River users meet amid crisis concerns--Note the nexus with electric power
Date: Wednesday, December 14, 2022 10:33:13 AM

G'Day fellow Growth Management Committee members!

I think the following article in today's UT was timely and relevant to tomorrow's meeting. Please note the following quote:

"Lake Powell's drop last March to historically low water levels raised worries about losing the ability---perhaps with the next few months---to produce hydropower that today serves about 5 million customers in seven states."

At next month's meeting we will be discussing ***Local electric power generation.***

http://enewspaper.sandiegouniontribune.com/infinity/article_share.aspx?guid=e0c7dd45-2294-4e8e-b363-0a677405977c

All the best,

Don Christiansen
Carlsbad Tomorrow Committee member

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

Colorado River users meet amid crisis concerns

Water recipients face dwindling resource as drought persists



Living with less water throughout the U.S. Southwest is the focus of a conference starting today in Las Vegas among Colorado River water users. (John Locher AP)

By KEN RITTER

LAS VEGAS

Living with less water in the U.S. Southwest is the focus this week for state and federal water administrators, tribal officials, farmers, academics and business representatives meeting about the drought-stricken and overpromised Colorado River.

The Colorado River Water Users Association conference, normally a largely academic three-day affair, comes at a time of growing concern about the river's future after

more than two decades of record drought attributed to climate change.

“The Colorado River system is in a very dire condition,” Dan Bunk, a U.S. Bureau of Reclamation water manager, declared during presentations streamed Nov. 29 and Dec. 2 that invited public comment about possible actions.

“Flows during the past 23-year period are the lowest in the past 120 years and (among) the lowest in more than 1,200 years,” Bunk told the webinar audience. The deadline for public submissions is Dec. 20 for a process expected to yield a final report by summer.

Bunk said the two largest reservoirs on the river — Lake Mead behind Hoover Dam on the Nevada-Arizona state line and Lake Powell formed by the Glen Canyon Dam on the Arizona-Utah line — are at unprecedented low levels. Lake Mead was at 100 percent capacity in mid-1999. Today it is 28 percent full. Lake Powell, last full in June 1980, is at 25 percent.

Scientists attribute extended drought to warmer and drier weather in the West to long-term, human-caused climate change. The effect has been dramatic on a vast river basin where the math never added up: The amount of water it receives doesn't meet the amount that is promised.

Lake Powell's drop last March to historically low water levels raised worries about losing the ability — perhaps within the next few months — to produce hydropower that today serves about 5 million customers in seven states. If power production ceases at Glen Canyon Dam, rural electric cooperatives, cities and tribal utilities would be forced to seek more expensive options.

Reclamation water managers responded with plans to hold back more water in Lake Powell but warned that Lake Mead water levels would drop.

The U.S. Bureau of Reclamation in June told the seven states that are part of the Colorado River Basin — Arizona, California, Colorado, Nevada, New Mexico, Utah and Wyoming — to determine how to use at least 15 percent less water next year, or have restrictions imposed on them. Despite deadlines, discussions have not resulted in agreements.

This year's meeting of water recipients begins today at Caesars Palace on the Las Vegas Strip. The event theme, “A New Century for the Colorado River Compact,” marks 100 years since a 1922 interstate agreement divvied water shares among interests in the seven states now home to 40 million people and millions of farmed acres.

Ritter writes for The Associated Press.

Date: December 14, 2022

To: Growth Management Citizens Committee (and members of the public)

From: Steve Linke, Traffic & Mobility Commission

Subject: Circulation performance standard

Summary

- Staff's proposed update to the Traffic Impact Fee (TIF) Program appears reasonable, and our committee should support the approach and recommend it be reviewed by the Traffic & Mobility Commission as soon as possible.
- However, the impact fee is only one component of the General Plan and Growth Management Plan (GMP) circulation requirements; it is not a "performance standard"; and it only addresses general, indirect impacts of developments.
- The other major component is the multimodal (pedestrian, bicycle, transit, and vehicle) level of service (LOS) framework, which works in parallel with the impact fee. The General Plan requires this approach, and our committee should recommend that it be fully implemented to address the direct, site-specific impacts of developments.
- To strengthen the LOS framework, our committee also should recommend that staff, in conjunction with the Traffic & Mobility Commission, completes the establishment of the pedestrian, bicycle, and transit LOS systems and requires the study of vehicle congestion mitigation at intersections.

Impact fee component of growth management

For the impact fee, a list is compiled of the larger improvement projects around the city that will complete the proposed mobility network in a general fashion. Then, the projected costs are divided up such that developers pay pre-determined fees based on the number and type residential units or commercial square footage they are adding.

The update, which is now finally in progress after promises back in 2015 when the General Plan was updated, will shift the focus from vehicle projects to pedestrian and bicycle projects. It also will shift the fee basis from the number of vehicle trips to person miles traveled (PMT), all of which is reasonable.

Looking at the Solana Beach program, on which our update is apparently based, the program is otherwise largely indistinguishable from Carlsbad's current TIF Program. For example, Solana Beach's PMT-based impact fee programs charges a one-time flat fee of \$1,288 for each predicted residential person trip. And the number of predicted person trips is virtually identical to the predicted vehicle trips that Carlsbad currently uses.

The key point here, though, is that this is not a growth management "performance standard"

and only addresses **indirect** cumulative citywide effects of development. It does not necessarily account for specific needs in and around individual project sites. Also, this is a general fee that goes into a pooled fund that finances citywide projects, and the fund likely will be insufficient to finance the projects without city (taxpayer) involvement.

LOS component of growth management

As I have detailed in previous communications, under growth management, developers also must pay their fair shares to fund projects that mitigate their **direct** impacts to the areas in and around the project site. Based on the General Plan and GMP, these direct impacts are determined by assessing pedestrian, bicycle, transit, and/or vehicle **LOS** as the **performance standard**, depending on which modes are prioritized on the streets surrounding the project.

Some developments may be in areas that are not congested and have ample multimodal facilities, in which case they would only pay the standard impact fee to mitigate their cumulative indirect effects. Other developments that add significant new users of the various modes to localized areas that are congested or lack sufficient multimodal facilities would be required to fund additional local improvements to mitigate their direct impacts.

For example, developments could be required to make improvements like high-visibility crosswalks, painted bike lanes, transit shelters, etc. Vehicle-wise, developments in the College Boulevard extension area would be required to fund part of that project, and developments that add traffic to congested intersections may be required to fund turn-lane enhancements, as has been the practice in Carlsbad for the last 30+ years.

Further, given the 2015 General Plan update, developments that add vehicle traffic to streets that have been exempted from growth management due to over-congestion should be required to implement measures to reduce vehicle usage—Transportation Demand Management (TDM)—although that still has not been fully implemented.

Conclusion

The Solana Beach municipal code and impact fee program call the program a means of mitigating overall cumulative impacts that would be difficult to mitigate on a project-by-project basis, and they go on to say that the impact fee is not meant to replace exactions or other measures required to mitigate site-specific impacts of developments.

Thus, these parallel “impact fee” and “direct mitigation” approaches continue to be the standard to account for all development impacts.