

From: [Don Christiansen](#)
To: [Growth Management Committee](#)
Cc: [Katie Hentrich](#); [Jason Haber](#)
Subject: LOCAL Electric Generation
Date: Wednesday, January 11, 2023 1:20:16 PM

Good Day Fellow *Carlsbad Tomorrow* Growth Management Committee Members!

Since *LOCAL* Electric Generation is on today's agenda I thought I'd share a few headlines:

U.S. Safety Agency To Consider Ban On Gas Stoves Amid Fears Of Pollution

"Gas stoves are bad for our health, and the strongest evidence is on children and *children's asthma*"

California is "the first U.S. state to phase out all new gas-fueled furnaces and water heaters in homes."

Carlsbad Mulls Requiring All-Electric Construction

"The ordinances require water heaters, clothes dryers, space heaters and other appliances in all new construction to be electric instead of natural gas"

S.D. Battery Research Gets \$16M

"The University of California San Diego will receive \$10 million to develop and scale up technology that recycles lithium-ion batteries. *Smartville Inc. of Carlsbad* has been awarded a \$6 million grant to extend battery use for energy storage systems."

The focus is to repurpose used EV batteries for renewable energy storage applications. California will ban the sale of new gas powered cars by 2035.

The need for electricity will increase significantly in the future. As I wrote in a previous email to our committee:

"The question is who is going to generate the electricity? An option is to do what makes *sustainable sense* and generate as much local electricity *as feasible* by turning rooftops, parking lots, and underutilized land that have been considered *liabilities into assets* by installing solar panels. ***LOCAL jobs and LOCAL business opportunities are created in the process.***"

Our *Clean Energy Alliance* is charged with buying renewable energy. Carlsbad is moving forward with the proposed development of a 50 acre parcel of City owned land (Maerkle Reservoir) as a solar farm. ***Very significant Federal Funding is now available*** via the Inflation Reduction Act and other programs. *RMI.org* (formerly Rocky Mountain Institute) provides Cities guidance on how to access those funds via their ***LEAF*** and ***FFOLD*** programs.

France has mandated that all parking lots over a certain size shall have solar electric canopies. Would the City of Carlsbad have the political will to enact a similar ordinance?

Our *Community Vision* statement reads: ***Sustainability:*** Build on the city's sustainability initiatives to emerge as a *leader* in green development sustainability. Pursue public/private partnerships, particularly on sustainable water, *energy*, recycling and foods.

Don Christiansen
Carlsbad Tomorrow Growth Management Committee Member

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

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 for Carlsbad LCPA-Parks Master Plan & Growth Management Plan Updates - Parkland losses not considered in minimal 3 acre Parkland dedication for new unlimited development
Date: Monday, February 6, 2023 9:21:24 AM
Attachments: [City losses from only requiring developers dedicate 3 acres of free City Parkland per 1,000 population.pdf](#)

Dear Carlsbad City Council, Carlsbad Tomorrow Growth Management Committee, Parks and Planning Commissions, and 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 February 2023 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, and
4. as public input to the CA Coastal Commission on Carlsbad's proposed Local Coastal Program Amendment.

Apparently on 1/26/23 the CTGMC did not have a discussion considering the impacts of a 3 or 4 or 5 acre per 1,000 population Parkland Dedication requirements as recommend Updates to the City Council.

Since there was no comparative discussion of the 3 to 4 to 5 acre Parkland dedication requirement for new developers the CTGMC did not compare/consider the relative impacts to City finances from the lost Parkland and/or Park-in-lieu-fees new developers would be giving to the City. Not considering the impacts to City finances and to the Quality of Life for the future seems somewhat irresponsible.

Following is a base calculation of the Parkland and/or Park money lost by the City by not Updating new developer Parkland dedication requirements to be consistent with the 5 acre per 1,000 population requirements of Encinitas and Oceanside. Carlsbad not matching and keeping up with new Parklands created by Encinitas and Oceanside will over time, and a several Housing Element (and required land use changes to higher-density) Updates, retard Carlsbad's desirability and Quality of Life. Remember CA law prevents any city from being 'Buildout', and future land use changes to create more new housing units will be required of Carlsbad (and every other city) at every eight year Housing Element Cycle.

It is folly to not consider these growth/Parkland impacts of more unlimited new high-density housing and lower relative new developer required Parkland dedication vis-à-vis adjoining Cities. Not considering the significant loss of free Parkland and/or free Park-in-lieu-fees from new development and the impact on City finances and Quality of Life is folly and mismanagement of Carlsbad Tomorrow.

[2021-29 Housing Element \(and required land use changes\) Update for ONLY to 2029 or next 7-years](#)

HCD required new Housing Units to be accommodated to 2029 = 3,900
Average population per housing unit in Carlsbad (2020 Census) = 2.64
Required new population to be accommodated until 2029 = 10,296 (8.9% City pop. increase)
For simplicity of comparison reasonably assume Carlsbad Land costs \$1 million per acre, so:

New developer Parkland Dedication and/or Park-in-lieu-fee (free to City) for 2021-29 period:
3 acres per 1,000 = 30.9 free to City Park acres or \$30.9 million in free Park-in-lieu-fees to add parks
4 acres per 1,000 = 41.2 free to City Park acres or \$41.2 million in free Park-in-lieu-fees to add parks
5 acres per 1,000 = 51.5 free to City Park acres or \$51.5 million in free Park-in-lieu-fees to add parks

Free to City Park acres or free Park-in-lieu-fees LOST to City by only requiring new developers provide 3 acres of Parkland per 1,000 in only 8-years (2021-29) Housing Element Cycle:

City loses 10.3 acres of free Parkland or \$10.3 million in Park-in-lieu-fees by not using 4 acres/1,000

City loses 20.6 acres of free Parkland or \$20.6 million in Park-in-lieu-fees by not using 5 acres/1,000

For an 8-year period losing 10.3 to 20.6 acres of free City Parkland or \$10.3 to \$20.6 million in free Park-in-lieu-fees are significant developer giveaways and impacts to City finances and future Quality of Life.

This loss of free Parkland and/or Park fees will repeat every 8-year Housing Element Update Cycle as CA HCD requires more land use changes to add more high-density housing units. These high-density housing units are most in need of City Parks to balance their high-density. Every 8 years there will be more increases City population and high-density development Parkland demands. City staff has indicated to the CTGMC that in the next 2030-38 Housing Element (and required land use changes) Update for that 8-year period that HCD will likely require be similar or more units to be provided in the 2030-2038 period as required in the 2021-29 period.

The CTGMC should have fully considered these issues and had a fair comparative consideration of the 3, 4, or 5 acre Parkland dedication issues.

The CTGMC and City Council should now require new development to dedicate 5 or 4 acres of free Parkland. This is common sense, wise land use/Park planning and prudent City fiscal policy.

Thanks you,
Lance Schulte

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These are significant developer giveaways and impacts to City finances and future Quality of Life. The lost free Parkland and/or Park fess will repeat every 8-year Housing Element Update Cycle as more land use changes are required to add more high-density housing units (that most need City Parks to balance the high-density) increases City population and Parkland demands. City staff has indicated to the CTGMC that in the next 2030-38 Housing Element (and required land use changes) Update for that 8-year period that HCD will likely require be similar or more units to be provided in the 2030-2038 period as required in the 2021-29 period. CTGMC and City Council should now require new development to dedicate 5 or 4 acres of free Parkland. This is common sense, wise land use/Park planning and prudent City fiscal policy.

Carlsbad losses from not requiring new developers dedicate 4 or 5 acres of Parkland

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 for Carlsbad LCPA-Parks Master Plan & Growth Management Plan Updates - Carlsbad below national average and lowest So CA Coastal city in providing Parks within 10-minute walk
Date: Sunday, February 5, 2023 3:58:47 PM
Attachments: [Carlsbad is below National Average & worst of 24 SoCal Coastal cities in providing Parks in a 10-minute walk to residents.pdf](#)
[TPL Support for Ponto Park - 2022-3-11.pdf](#)
[CTGMC key issues and suggestions -2022-12-6.pdf](#)

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1. the CTGMC's February 2023 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, and Carlsbad's Ponto Planning Area F and Site 18 planning and development applications, and
4. as public input to the CA Coastal Commission on Carlsbad's proposed Local Coastal Program Amendment.

For years Carlsbad Citizens have told the City that there is a need for a Park at Ponto:

- to provide for documented Coastal Recreation (i.e. Public Park) land use at Ponto,
- to correct for the conversion of a 12.8 acre Recreation Commercial land use to Residential use and the elimination of planned Coastal Open Space at Ponto,
- to correct the Carlsbad's Park Master Plan documented lack of Park Service at Ponto,
- to provide South Carlsbad (62% of Carlsbad's total population and the City's major Coastal visitor and transit occupancy tax generator) with their ONLY Coastal Park west of I-5. The City unfairly, and contrary to CA Coastal Act Policy disproportionately provides 10 parks totaling 37 acres west of I-5 in Coastal North Carlsbad for 38% of the population but 0 (zero) Coastal Parks and 0 (zero) Coastal park acres west of I-5 in Coastal South Carlsbad for 62% of the population,
- to provide for an existing 6.5 acre local Neighborhood (i.e. Special use area) Park need at Ponto, and
- to provide a City Park within a 10-minute walk for Ponto residents.

Failure to correct this documented City Park unfairness is very damaging to the citizens, City finances, South Carlsbad's and California's visitor industry. The Coastal Recreation data file sent to you earlier documents some of the key facts.

However, we conducted some additional Trust for Public Land 10-minute walk data collection that the City Council, CTGMC, Parks and Planning Commissions and CA Coastal Commission need to also consider. That data is below and in the attached file, and again with last year's Trust for Public Land Ponto Park support letter (again attached) that reflects on Carlsbad poor performance relative to the 24 So Cal Coastal Cities (165 miles of coastline) from Malibu to the Mexican border in providing

Parks within a 10-minute walk. The data and links to the data source is:

Carlsbad is 10% below the national average for cities & the worst of 24 Coastal So California cities - 165 miles of coastline - in providing Parks within a 10-minute walk to residents

The Trust for Public Land documents a city's 10-minute walk to Park at

<https://www.tpl.org/parkserve>

The Average USA City provides Parks within 10-minute walk to 55% of residents [10% above Carlsbad].

Carlsbad provides Parks within 10-minute walk to **49.9% of residents [10% below National Average]**.

New York City provides Parks within 10-minute walk to 99% of residents.

The Trust of Public Land submitted a letter to the City of Carlsbad, CA Coastal Commission, and CA State Park supporting Ponto Park

Carlsbad is the worst of 24 Southern CA Coastal cities (from Malibu south to Imperial Beach along 165 miles of coastline) in providing Parks within 10-minute walk to residents:

1. Palos Verdes Estates provides Parks within 10-minute walk to 100% of residents
2. El Segundo provides Parks within 10-minute walk to 100% of residents
3. Hermosa Beach provides Parks within 10-minute walk to 100% of residents
4. Redondo Beach provides Parks within 10-minute walk to 98% of residents
5. Manhattan Beach provides Parks within 10-minute walk to 95% of residents
6. Del Mar provides Parks within 10-minute walk to 93% of residents
7. Dana Point provides Parks within 10-minute walk to 89% of residents
8. Huntington Beach provides Parks within 10-minute walk to 85% of residents
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11. Santa Monica provides Parks within 10-minute walk to 82% of residents
12. San Diego provides Parks within 10-minute walk to 81% of residents
13. Coronado provides Parks within 10-minute walk to 76% of residents
14. Newport Beach provides Parks within 10-minute walk to 76% of residents

15. Imperial Beach provides Parks within 10-minute walk to 74% of residents
16. Encinitas provides Parks within 10-minute walk to 68% of residents
17. Los Angeles provides Parks within 10-minute walk to 63% of residents
18. Solana Beach provides Parks within 10-minute walk to 63% of residents
19. Oceanside provides Parks within 10-minute walk to 58% of residents
20. Seal Beach provides Parks within 10-minute walk to 57% of residents
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23. Rancho Palos Verdes provides Parks within 10-minute walk to 50% of residents
24. **Carlsbad** provides Parks within 10-minute walk to **49.9% of residents.**

Carlsbad is the lowest & most unfair to citizens of the 24 Southern California Coastal cities along 165 miles of coast from Malibu to Imperial Beach.

Source of data: Trust for Public land parkscores

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Trust for Public Land's 10-minute walk to Park Maps/data:

Carlsbad = <https://parkserve.tpl.org/mapping/index.html?CityID=0611194#reportTop>

Encinitas = <https://parkserve.tpl.org/mapping/index.html?CityID=0622678>

Irvine = <https://parkserve.tpl.org/mapping/index.html?CityID=0636770>

Please, Please, please, consider and discuss this data, and

1. Create a 10-minute walk to City Park Standard in the
 - a. Parks Master Plan,
 - b. Growth Management Plan Update, and
 - c. Local Coastal Program Update.
 2. Create a Park Policy that requires developers to dedicate Park Land (not pay Park-in-lieu-fees) in areas that do not a minimum of 3 acers of City Park for each in 1,000 population within a 10-minute walk of the developer's proposed development (see attached CTGMC Key Issues & Suggestions file for details and Open Space suggestions)
 3. Fix Coastal South Carlsbad's documented City Park inequity/unfairness with a significant and real Ponto Park
 4. Save tax-payers tens of millions in dollars by cost effectively purchasing vacant land at Ponto for a Park, v. trying to maybe make a few bits of narrow PCH roadway median as a pseudo-park
- Do you want Carlsbad to be the worst city in Coastal Southern California in providing accessible Parks within a 10-minute walk to residents?
 - Do you want Carlsbad to fail to upgrade its park standards while other cities updated their park Standards and make their cities more desirable?

- Do you want to undermine the quality of life for Carlsbad citizens and their children by not providing a park within a 10-minute walk to their home?
- Do you want to force Carlsbad families to have to drive to park?
- Do you want to slowly undermine a key visitor serving industry in South Carlsbad by not providing a significant and true and meaningful Coastal Park in South Carlsbad?
- Do you want tax-payers to pay tens of millions more to try to maybe try to make a few narrow portions of PCH median useable to people?

Please take responsibility and full ownership of your decisions on these important issues and questions. The individual decisions you make will likely be the last ones made. Once vacant land like at Ponto is developed it will be forever lost to address the critical, well documented Park and Coastal Park needs at Ponto as overwhelmingly communicated by Carlsbad Citizens and visitor businesses, and other citizens.

Please be wise and think about the future your decisions will bring.

Thank you,
Lance Schulte

PS: The initial version of the “CTGMC key issues and Suggestions 2022-12-6” file (attached) 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

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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

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]
X 15%	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: [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"](#)
Cc: info@peopleforponto.com
Subject: Public input for February 2023 Carlsbad Tomorrow Growth Management Committee mtg & et.al. for LCPA - 11 points & personal comments - 5 - 3
Date: Sunday, January 29, 2023 3:20:58 PM
Attachments: [Protect Ponto Petition Letter.msg](#)
[Protect Ponto Petition Letter.msg](#)
[Protect Ponto Petition Letter.msg](#)

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

Dear City of Carlsbad please deliver these 5th batch of 3 more (running total of 100) petitions and personal insights and comments for the February 2023 CTGMC meeting; and please distribute to the City Council, Parks-Housing-Planning Commissions as public communications so they area also aware of this public input.

Thank you.

Lance Schulte

For the many
People for Ponto

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

From: [People for Ponto Petition](#)
To: petition@peopleforponto.com
Subject: Protect Ponto Petition Letter
Date: Saturday, January 28, 2023 2:27:57 PM

Protect Ponto Petition:

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

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

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

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

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

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

Accordingly, I am making my position known and requesting that

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

- 1) Address the true neighborhood Park needs for Ponto (minimal 6-7 acre Park to serve minimal neighborhood needs based on Ponto buildout and City's current minimal Park Standard). Ponto Park should be an appropriately wide, viable, flat and fully useable multi-use grassed field – allow kids space to play informal sports. No thin strip of non-park land.
- 2) Address loss of 32+ acres of Coastal Open Space Land from sea level rise by providing for Non-neighborhood City and State buildout-population and visitor demands for both Coastal Recreation land use and the loss of the Campground. Provide sufficient Coastal Recreation and Low-cost Visitor Accommodation land use to address the CA Coastal Act and City/State 'unlimited buildout population/visitor demand', and planned loss of current supply due to planned sea level rise.
- 3) Disclose and address 2017 CA Coastal Commission direction to City on Ponto Vision Plan and Planning Area F Existing LCP in the PCH Project.
- 4) Fully address Sea Level Rise impacts consistent with CA Coastal Act & Commission relative to the State's recent requirement for unlimited City and State population growth. Document, plot the Seal Level Rise inundation and coastal erosion/bluff hazard areas in Carlsbad's General Plan including the Land Use Map, PCH Relocation Project maps, and in the PCH Project replace all 32+ acres of high-priority Coastal land use that will be lost to sea level rise and coastal erosion, and increase the supply of these high-priority Coastal land uses to address State required unlimited increases in City/State population and visitor demands.
- 5) Fully disclose and consider the 2022-June General Comparative tax-payer Costs/Benefits Analysis of Ponto Park-PCH completion-proposed PCH Relocation, to assure tax-payers (City and/or State) are getting the best and most sustainable value for their tax-payer dollars. The City should use tax-payer money wisely.
- 6) Incorporate the 5,000+ written/emailed petitions to the Council & CA Coastal Commission, and the Letters from Carlsbad visitor industry, Surfrider Foundation, and Batiquitos Lagoon Foundation.
- 7) Within the Local Facilities Management Plan Zone 9 portion fully provide the 30-acers of documented missing Unconstrained Growth Management Open Space that developers were supposed to provide. Also fully disclose and incorporate the Ponto Open Space recommendations from North County Advocates per City's lawsuit settlement. Fully preserve or mitigate sensitive habitat areas within and adjacent to the

PCH Project area.

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

9) I am concerned about the PCH Modification Project more than doubling traffic congestion along Coast Highway for an extremely costly walkway, when the same walkway and other needed Coastal land uses can be provided for a fraction of the cost along existing Coast Highway. It is not appropriate to try to pass off a walkway as "linear park".

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

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

Name

Christy Johnson

Email

ntgworldtour2@gmail.com

City

Carlsbad

State

CA

From: [People for Ponto Petition](#)
To: petition@peopleforponto.com
Subject: Protect Ponto Petition Letter
Date: Thursday, January 26, 2023 8:12:55 PM

Protect Ponto Petition:

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

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

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

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

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

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

Accordingly, I am making my position known and requesting that

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

1) Address the true neighborhood Park needs for Ponto (minimal 6-7 acre Park to serve minimal neighborhood needs based on Ponto buildout and City's current minimal Park Standard). Ponto Park should be an appropriately wide, viable, flat and fully useable multi-use grassed field – allow kids space to play informal sports. No thin strip of non-park land.

2) Address loss of 32+ acres of Coastal Open Space Land from sea level rise by providing for Non-neighborhood City and State buildout-population and visitor demands for both Coastal Recreation land use and the loss of the Campground. Provide sufficient Coastal Recreation and Low-cost Visitor Accommodation land use to address the CA Coastal Act and City/State 'unlimited buildout population/visitor demand', and planned loss of current supply due to planned sea level rise.

3) Disclose and address 2017 CA Coastal Commission direction to City on Ponto Vision Plan and Planning Area F Existing LCP in the PCH Project.

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

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

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

7) Within the Local Facilities Management Plan Zone 9 portion fully provide the 30-acers of documented missing Unconstrained Growth Management Open Space that developers were supposed to provide. Also fully disclose and incorporate the Ponto Open Space recommendations from North County Advocates per City's lawsuit settlement. Fully preserve or mitigate sensitive habitat areas within and adjacent to the

PCH Project area.

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

9) I am concerned about the PCH Modification Project more than doubling traffic congestion along Coast Highway for an extremely costly walkway, when the same walkway and other needed Coastal land uses can be provided for a fraction of the cost along existing Coast Highway. It is not appropriate to try to pass off a walkway as "linear park".

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

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

Additional Comments

Dear Carlsbad Tomorrow Growth Management Committee ,
Carlsbad City Council, and CA Coastal Commission

The last remaining open space in SW Carlsbad must be protected and kept for Ponto Park! I've lived here for 25 and love the open space, nature and natural habitats about the Ponto area- the only thing that can make it better is having a usable coastal park for all to enjoy!

Thank you,

Nicole Kapan

Name

Nicole Kapan

Email

nicolemkapan@gmail.com

City

Carlsbad

State

Ca

Sent from [People for Ponto](#)

From: [People for Ponto Petition](#)
To: petition@peopleforponto.com
Subject: Protect Ponto Petition Letter
Date: Thursday, January 26, 2023 3:21:45 PM

Protect Ponto Petition:

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

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

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

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

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

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

Accordingly, I am making my position known and requesting that

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

- 1) Address the true neighborhood Park needs for Ponto (minimal 6-7 acre Park to serve minimal neighborhood needs based on Ponto buildout and City's current minimal Park Standard). Ponto Park should be an appropriately wide, viable, flat and fully useable multi-use grassed field – allow kids space to play informal sports. No thin strip of non-park land.
- 2) Address loss of 32+ acres of Coastal Open Space Land from sea level rise by providing for Non-neighborhood City and State buildout-population and visitor demands for both Coastal Recreation land use and the loss of the Campground. Provide sufficient Coastal Recreation and Low-cost Visitor Accommodation land use to address the CA Coastal Act and City/State 'unlimited buildout population/visitor demand', and planned loss of current supply due to planned sea level rise.
- 3) Disclose and address 2017 CA Coastal Commission direction to City on Ponto Vision Plan and Planning Area F Existing LCP in the PCH Project.
- 4) Fully address Sea Level Rise impacts consistent with CA Coastal Act & Commission relative to the State's recent requirement for unlimited City and State population growth. Document, plot the Seal Level Rise inundation and coastal erosion/bluff hazard areas in Carlsbad's General Plan including the Land Use Map, PCH Relocation Project maps, and in the PCH Project replace all 32+ acres of high-priority Coastal land use that will be lost to sea level rise and coastal erosion, and increase the supply of these high-priority Coastal land uses to address State required unlimited increases in City/State population and visitor demands.
- 5) Fully disclose and consider the 2022-June General Comparative tax-payer Costs/Benefits Analysis of Ponto Park-PCH completion-proposed PCH Relocation, to assure tax-payers (City and/or State) are getting the best and most sustainable value for their tax-payer dollars. The City should use tax-payer money wisely.
- 6) Incorporate the 5,000+ written/emailed petitions to the Council & CA Coastal Commission, and the Letters from Carlsbad visitor industry, Surfrider Foundation, and Batiquitos Lagoon Foundation.
- 7) Within the Local Facilities Management Plan Zone 9 portion fully provide the 30-acers of documented missing Unconstrained Growth Management Open Space that developers were supposed to provide. Also fully disclose and incorporate the Ponto Open Space recommendations from North County Advocates per City's lawsuit settlement. Fully preserve or mitigate sensitive habitat areas within and adjacent to the

PCH Project area.

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

Name

Jason Bishop

Email

jasonbishopdds@yahoo.com

City

Carlsbad

State

CA

From: [Ioni Tcholakova](#)
To: [Growth Management Committee](#)
Subject: Growth Committee Meeting Discussion Item 1, Circulation Standard
Date: Thursday, January 26, 2023 4:57:16 PM

Dear Carlsbad Growth Management Committee,

Regarding the Proposed Circulation Standard,

Transitioning from the Traffic Impact Fee to the Multimodal Transportation Fee and utilizing person miles traveled is an important push towards holistic mobility planning.

My recommendations and things to consider are as follows:

1. Often, the costs of the development process can become a barrier to the development of affordable housing. Equitable and just growth management should ensure that the recommendation for the multimodal transportation fee does not disproportionately deter the development of greater affordable housing units. In addition, as high density housing is likely to bring a greater count of PMT, the fees required will likely be larger. I suggest adding the relevant bolded language, "Development of standards and a fee structure for private development to provide a fair share to partially fund the buildout of the city's multimodal transportation network. **This fee structure shall provide flexible cost requirements for projects that maximize the number of affordable housing units beyond the required standard.**"
2. In order to have just growth, it is important that the MTIF goes both towards general community projects as well as localized developments. When assessing community benefits of projects, these should be done with intentional planning to undo injustice in the region. This can be added to the language in bold: "Utilize the SMP and MTIF to implement future multimodal transportation impacts that provide the greatest **and most just benefit to the community through both localized and general community projects,**"
3. Consideration of mobility patterns should be sensitive to all modes of mobility outside of vehicular travel, in particular the importance of public transportation in the region. This can be supported by adding the following bolded language: "Relationship between traffic operations, changing commute patterns, regional traffic volume growth, traffic safety and new disruptive trends in mobility technologies, and the **importance and prioritization of high density affordable mobility options such as public transportation,**"
4. Clarify what outcomes result from conducting the LOS and MMLOS analysis to ensure coordination with the Sustainable Mobility Plan goals. To what extent will the developer have to mitigate the impacts? This should be defined in the recommended language.

Thank you!

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From: [Patricia Bleha](#)
To: [Growth Management Committee](#)
Cc: pcb@sbcglobal.net
Subject: comments on Agenda Jan. 26
Date: Thursday, January 26, 2023 3:58:41 PM

1. Committee Business Parks Standards

Staff recommendation should be to keep existing standard 3 acres per 1,000 and do not count other city owned or controlled recreational acreage as part of parks. The former are in addition to and should not be changed.

Staff should evaluate the accessibility of parks based on 10 min. travel time to any publicly accessible park.

Access is the key issue and needs to be addressed. Better yet .5 acres city wide for all neighborhoods that do not have a park within ½ mile. (The 11 zones exempted for open space in many cases are the ones that also need accessible parks. Let's get with this issue once and for all.

Patricia Bleha, president North County Advocates

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