

Date: March 21, 2023

To: Carlsbad Tomorrow/Growth Management Citizens Committee

From: Steve Linke, Traffic & Mobility Commission primary representative

Subject: March 23, 2023 report review/proposed amendments

GROWTH MANAGEMENT REPORT

I propose that the “Other Considerations” sections of the Parks and Open Space Standards be amended as follows to better reflect the Committee’s votes and stated rationales:

Parks Standard “Other Considerations” amendment

~~The committee discussed a number of options for amending the standard. Some committee members preferred a citywide standard of 4 acres per 1,000 population- and/or exploring alternative ways to document what constitutes a park, excluding acreage inaccessible to humans, and/or restricting the acreage of Veterans Memorial Park to the northwest quadrant given its reduced scope.~~ In the end, the majority voted to retain the existing standard. To address the access to parks, a majority of the committee also voted to request that City Council direct staff to evaluate the feasibility of a standard based upon a distance measure to any publicly accessible park.

Open Space Standard “Other Considerations” amendment

When growth management was first implemented, several zones were exempted from the open space standard based on their 1986 planning and development status. Because planning changes and re-development have and likely will continue to alter the status in the exempt zones over time, Some committee members preferred to look at ways to reverse the exemptions, apply a citywide standard, and/or look into linkage fees. The majority of the members preferred to keep ~~the spirit of~~ the original standard in place ~~and augment with a statement regarding open space policies that apply to all zones.~~

Open Space status deletion/amendment

In addition, the Open Space Standard “Rationale” and “Status” sections, including the status table, contain potentially misleading claims about most of the zones having more than 15% open space, so I propose removing them.

The 15% performance standard must be calculated **after** subtraction of “environmentally constrained non-developable land.” However, the statements and table are based on calculations made from **total** open space—**without the subtraction**. This creates the false impression that 24 of the 25 zones would pass the standard, regardless of exemption status.

The actual 15% performance standard calculations presumably could have been provided for each zone, but the response to my requests for those numbers at our last committee meeting and in a follow-up email was simply that they “live in other documents.” So, we will not get to see the actual relevant numbers.

Accordingly, the two misleading statements and table should be removed, and the most we should say in the Status section is:

The 14 of 25 zones that are not exempt from the open space standard are currently meeting the 15% minimum standard according to staff.

QUALITY OF LIFE STATEMENTS

Combine with the Growth Management Report

I have never understood why the quality of life statements/recommendations need to be in a separate document, instead of including everything in a single report.

In the revised “Parks” section of the main Growth Management Report, the acres/population standard is provided first, but the next section is entitled “Additional recommendation” and contains the further recommendation to explore the feasibility of an additional travel distance-based standard.

That same approach should be taken for the “Open Space” and “Transportation and Mobility” portions of the Quality of Life document—move those bullet points to “Additional recommendations” sections in the corresponding topics in the Growth Management Report.

Then, just make a new section at the end of the Growth Management Report called “ADDITIONAL RECOMMENDATIONS” for the rest of the “Quality of Life Statements” with headings similar to the growth management sections. Or, promote them by placing them before the list of standards that we are just recommending eliminating.

Or, promote them even further by putting them at the very beginning—before the performance standards. Frankly, the only meaningful recommendations with any vision for the future are in these statements (e.g., Energy and “Proposition H”). For the growth management portion, we are largely just eliminating or keeping unchanged all of the original 1986 performance standards, so it could be argued that those should be the part relegated to an appendix. That said, I also agree with the sentiment expressed at our last meeting that some of the Quality of Life statements are also vague to the point of being meaningless (e.g., “Homelessness” and “Seniors/Aging Community”).

Open Space amendments

I believe the following more fully reflects the discussion leading up to the committee consensus:

Additionally, the committee recommends that the City Council add the topic of open space to the purview of the Parks & Recreation Commission or a separate citizen committee to address open space needs throughout the city, ~~address potential open space deficits and evaluate opportunities to acquire more open space~~ by updating the list of candidate properties for proactive open space acquisition and by developing a plan that prioritizes zones with less unconstrained open space or that are subject to loss due to sea level rise.

Please also consider adding the following recommendation to council:

Adopt a policy that discourages exceptions to development standards that would decrease open space.

Transportation and Mobility amendments

Please also consider adding the following recommendations to council:

Complete the city's typology-based street network, as described in the General Plan Mobility Element.

Adopt a policy that discourages land use changes that allow developers to convert planned commercial/mixed use to residential uses that increase vehicle miles traveled.

From: [Harry Peacock](#)
To: [Growth Management Committee](#)
Subject: Comments on Draft Report and Open Space Standard Report
Date: Tuesday, March 21, 2023 10:22:01 AM

Please see the below proposed corrections, additions and deletions.

page 7 "What, When, How" reference. The new Plan should also provide a "Where" as a part of the new plan.

page 8 LFM 2s. Fails to mention they were exemptions.

page 11 Delete last paragraph as it is totally self-serving

page 12 Delete first paragraph for the same reason as above

page 14 where is "community values" "note absence of neighborhood parks where Community Vision Statement calls for more activity on the coastline and access to parks.

p.29 Rationale 3rd point - second line, word AS should be HAS.

p31 inventory existing - not accurate as the actual acreage is not in these quadrants due to Council decisions on Veteran's Park acreage distribution.

Where is the Open Space Standard Report??

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

From: [Harry Peacock](#)
To: [Growth Management Committee](#)
Subject: My Views on What The Growth Management Plan foe 2050 Should Be Containing Relative To Park Standers Park Requirements
Date: Tuesday, March 21, 2023 11:26:55 AM
Attachments: [Proposed Park Standard.docx](#)

While I may be the lone voice in suggesting a different approach to park requirements because of the history of what the actual effect of the original plan was on where parks are located and why the exempt zones in the southwest portion of the city should have had their exemptions deleted along with the plans that never happened, resulting in the fact that the nearest park is actually more than 2 miles away from local neighborhoods and that the area north of Cannon and west of I-5 have 37 acres of parks and the area south of Cannon and west of I-5 have zero acres has, in all fairness, to be addressed.

Please distribute the attached proposal on how to deal with this issue to the fellow members of the Committee.

Sincerely,

Harry Peacock, District 4 Appointee

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3/20/2023

**Submitted by Harry Peacock, District 4 Member of the Carlsbad Tomorrow Growth
Management Committee**

- 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 have a minimum of 3 acers of City Park for each 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. Change the population increase estimate by utilizing a expected new population to be 1.5 persons per new bedroom constructed. Assure that this new standard also applies to all new structures, ADU on existing developed residential lots as well as re-models and additions. Also apply to all new retirement and assisted living units and developments.**
 - 4. Fix Coastal South Carlsbad's documented City Park inequity/unfairness with a significant and real Ponto Park**
 - 5. 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 continue to have to drive to the nearest 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 of more dollars to try to maybe make a few narrow portions of PCH median useable to people? Ask yourself if you would like to have your grandkids playing Frisbee just a few yards away from a highway with a 50 mph speed limit because the city decided that a "linear park" is what the southwest Carlsbad community wants over a regular neighborhood park? Don't forget the old saying, "no matter how much lipstick you put on a pig, it's still a pig.**

SUPPORTING FACTORS

Community Vision

Access to recreation and active, healthy lifestyles

Promote active lifestyle and community health by furthering access to trails, **parks, beaches** and other recreation opportunities.

The local economy, business diversity and tourism

Strengthen the city's strong and diverse economy and its position as an employment hub in north San Diego County. Promote business diversity, increased specialty retail and dining opportunities, and **Carlsbad Tourism**.

Neighborhood revitalization, **community design** and livability

Revitalize neighborhoods and enhance citywide community design and livability. **Promote a greater mix of uses citywide, more activities along the coastline** and link density to public transportation. Revitalize the downtown Village as a community focal point and a unique and memorable center for visitors, and rejuvenate the historic Barrio neighborhood.

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
9. Long Beach provides Parks within 10-minute walk to 84% of residents

PROPOSED PARK DEVELOPMENT STANDARD FOR CARLSBAD TOMORROW 2050 GROWTH MANAGEMENT PLAN

10. Laguna Beach provides Parks within 10-minute walk to 82% of residents
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
21. Malibu provides Parks within 10-minute walk to 53% of residents
22. San Clemente provides Parks within 10-minute walk to 52% of residents
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 in terms of convenient access to parks.

Source of data: Trust for Public Land Park Scores

That part of Carlsbad north of Cannon Road and west of I-5 has 37 acres of existing city parks.

That part of Carlsbad south of Cannon Road and west of I-5 has 0 acres of existing city parks.

This is the actual result of the application of the current park standard in the existing Growth Management Plan.

PROPOSED PARK DEVELOPMENT STANDARD FOR CARLSBAD TOMORROW 2050 GROWTH MANAGEMENT PLAN

Was it the intention of the city to have no parks south of Cannon Road and west of I-5? If so that policy needs to be abandoned in all fairness to the 1,000s of Carlsbad residents in that portion of the city.

The proposed park development standard would address this obvious discrimination.

Community Vision Statements Relating to parks, beaches, Carlsbad Tourism and more activities along the coastline.

Of Carlsbad's 4,399 hotel rooms and more than 200 beach camping spots the vast majority are located south of Cannon Road and approximately 25% are located west of I-5, yet there is not a single acre of city parks to support this number two overall tourist attraction, Carlsbad's beaches.

Here is how Carlsbad compares to some other coastal cities in terms of hotel rooms per mile of coast line in California and walkability percentage.

| City | Rooms | Coastline Miles | Rooms per mile | Rank | 10-minute Walk % | Ranking |
|----------------|-------|-----------------|----------------|------|------------------|---------|
| Carlsbad | 4,399 | 6 | 733 | 2 | 49.9 | 8 |
| Del Mar | 594 | 2 | 297 | 5 | 93 | 1 |
| Laguna Beach | 1,165 | 7 | 166 | 7 | 82 | 4 |
| Newport Beach | 3,201 | 10 | 320 | 4 | 76 | 7 |
| Huntington Bch | 2,070 | 8.5 | 244 | 6 | 85 | 3 |
| Santa Monica | 3,567 | 3 | 1,189 | 1 | 82 | 4 |
| Santa Barbara | 3,534 | 6 | 589 | 3 | 78 | 6 |
| Monterey Cnty | 6,114 | 99 | 62 | 8 | 88 | 2 |

The city must also take into account not only the demand for beach access and a coastal park to fulfill the need to accommodate future residential growth in the city but also continued growth in the population outside of the city. Carlsbad cannot increase its miles of coastline (indeed with sea-level rise the amount of useable coastline may, in fact, be diminished). Assuring affordable coastal recreation and camping facilities are, at least, not diminished from the current supply has to be taken into account as well. A park at Ponto with some such facilities included, whether they be private, city owned or operated in concert with State Parks has to be given serious consideration.

The lack of a park at Ponto thus currently has a negative impact on tourism in addition to a negative impact on that portion of the city's residents who live there. Further, without providing for a park at Ponto any additional residential development will only make this walkability issue worse for the southwest quadrant of the city.

PROPOSED PARK DEVELOPMENT STANDARD FOR CARLSBAD TOMORROW 2050 GROWTH
MANAGEMENT PLAN

A Ponto Park would be a real step forward in providing “more activities along the coastline” by providing a park just adjacent to South Ponto State Beach and all the camping sites. It would further access to beaches and trails and help promote Carlsbad Tourism, addressing and supporting specific portions of the Carlsbad Community Vision.