

July 12 2024

To: City of Carlsbad, Planning Commission and City Council  
Re: Carlsbad Village Mixed Use, SDP 2023-0014

From: Clyde Wickham- Retired City Employee (Current Development Engineer)

**WELCOME TO CARLSBAD !**

This was our City Staff's statement and mantra to showcase the Village of Carlsbad and make a statement to demonstrate how development should be done. The City has always been a leader in design and development, throughout San Diego County. This project as proposed is NOT something to be proud of. It is too big, too crowded and proposes too much to be crammed into a 4 acre lot - **right at the Village's doorstep; the gateway of Carlsbad.** The front door to our "Village". We protected this entrance, When there was a redevelopment District, we used a Manual to keep the "Village" feeling and common Decor.

Senate Bill 330 has taken over our discretionary review process. Even with this loss, City Staff should have reviewed it more thoroughly.

Instead ... the Citizens have to do the Job of Staff and now Planning Commission.

Here are some Questions that need to be answered:

Has this Developer (Tooley or ?) EVER BUILT A PROJECT LIKE THIS..... of this difficulty, this complexity, AND with these waivers and these Bonus Densities? Please ask this question and be careful to fact check his answer.

What is the CURRENT VOLUME OF TRAFFIC ON CARLSBAD VILLAGE DRIVE? AM & PM peak. Again make sure staff answers this correctly.

What is the available capacity of Carlsbad Village Drive? Again, TRUST STAFF TO ANSWER THIS.

What is the traffic accident history on this piece of roadway? City Staff records this information annually.

The Consultants that the developer has hired are truly working for the developer. Their reports and documents are not complete. Technically, this project is still not a complete submittal. (City Council Policy 84) because.....

There are some major gaps in the site plans before you:

Why is there no detailed grading plan?

Why are there no details of the number of piles to be driven for foundation stability. "To be addressed upon final design" is NOT an acceptable answer. Consider the health & safety of the Carlsbad elderly citizens. Will they have to put up with pile driving for a

month? or longer? Even a simple answer like there are 15 Piles and the estimated time to drive these will take a month. - There is no answer to this question - except details will follow.

Why is the traffic study eliminating 616 vehicles of traffic? I know some citizens will walk to the grocery store (if you call it that) and some will walk to 7-11. But 1/2 of the residential traffic count generated by this project has been "reduced by 50% (internal capture)". THIS IS WRONG. I know the consultant will say it's within internal trip capture, but this project does not have a large Market - except - they only have less than 1/2 the size of the existing grocery store. This alone doesn't make sense.

The LL& G traffic report has inconsistent facts ... the ADT information was produced by cell phone traffic and street light data (P.7 of LL&G report). Again not a clear and precise method of reporting ADT. The traffic engineer may argue in favor of this method of measurement and will say it's an acceptable standard of study. NOT IN MY BOOK. It appears this method was used for the benefit of the developer and in contrast to the loss for the City. The data presented in the traffic report is conflicting. I recommend going back to the basics; use the SAN DAG Guide. Interestingly, they only used the SAN DAG guide for the traffic to be removed.

I am not arguing the EIR report I am arguing about the errors of the traffic study that I don't believe the Staff has adequately reviewed.

This project is ready to be approved without a complete staff review. I have read the staff report and believe the site plan does not include adequate information for the approval of this project. This is a sad day for all of us. If approved, this will be a development scar for ever. If it fails the developer will just sell it and move on. **He has never built a project of this size and complexity**

First and Foremost, this project is in the wrong location.

Carlsbad Village Drive is an arterial that cannot accommodate the traffic as proposed.

The proposed project cannot accommodate the required parking necessary to serve the project citizens and the future residents of Carlsbad. The Staff says "It Is Exempt" because it's within a 1/2 mile of the train.

The SDP mentioned above has been processed without Public Notice to the adjacent and residents that will be effected by the project. **City Council Policy No. 84 requires this notification to be complied with BEFORE the project can be Deemed COMPLETE.** The "Effected Stake Holders" SHALL be notified and the list may be extended to reach these citizens. The impact of this project is larger than the typical 300 or 600' radius. It serves the beach area, and to the east, Valley Street. North to the Buena Vista Lagoon and possibly south to Tamarack Ave. The Hardware store serves all of those properties mentioned above. The "Denault's" Hardware Store was mitigation for the Train Station Project almost 20 years ago.

More importantly  
Lets look at what is wrong:

1. **There was absolutely no public out reach or "Community Stakeholder Communication"** (City Council Policy No 84).
2. **There was no conclusive answer to the required Parking spaces.**
3. **There was no conclusive answer to how much Average Daily Traffic proposed or existing.** The staff answer was, we don't do that anymore..... And... we use VMP and VMT as our traffic tool to study traffic instead. **YOU SHOULD USE EVERY TOOL that YOU HAVE available. Using both methods wouldn't hurt.** The VMP was created by CalTrans as a tool to monitor and study air pollution. One (ADT calculation) counts how much traffic is onsite and the other (VMP) counts how well the traffic flows to the street system. I know staff does not use LOS (Level of Service), **But they should.** As stated above the volume of traffic cannot be absorbed on Carlsbad Village Drive. These tools will show the impact and what will fit on the available roadway.
4. The answer of **"Our Hands are Tied"** is simply not acceptable. Your hands - as staff- are never tied, Unless your managers are directing you to ignore common sense - and just approve what you have on your desk and move on. The hands of the Planning Commission are not "tied" either, you are an arm of discretionary approval for the City of Carlsbad. Stand up and say NO to this project as proposed.
5. I know there will be a rebuttal to this paragraph, but **the numbers that the developer gave you are WRONG.** They subtracted the commercial parking and never added what was left over back in to the proposed parking spaces. They reduced the traffic before they gave the bonus and the waivers to the project. The total project parking and traffic as a whole should be identified BEFORE they add the Bonus Density and Waivers. This alone is a serious mistake of the project. It was incorporated into the CEQA document, and i'm not trying to argue with the document I am arguing with the **MISTAKE.**
6. **The Pedestrian Element has not been addressed.** How will elderly citizens maneuver in and out of the project? When walking, the pace of an elderly citizen is slow. All Traffic Engineers know this. Signals have to be extended to allow for pedestrian crossing. If a person misses the signal crossing light and tries to cross on the flashing light, they will make it to the middle. Then we are on the edge of an accident.
7. With all of the construction traffic, bike and pedestrian access will be more of a safety hazard.
8. There will be more than 50 truckloads of export (earth) leaving this site (750 Cubic Yards). This is only the earthwork ,there will be the same or more truckloads of construction demolition and debris from this site.
9. The ground water level is reported to be 5' below the surface. This will exacerbate the soils removal and the demolition to be hauled away. With the water table as reported, the proposed construction will require pilings to be placed (Pounded). This is to support the foundations and 5-story buildings.They didn't say how many pilings will be required, that is to be determined **AFTER** the approval. This should be discovered **NOW, BEFORE** the approval. What if there are 15 Pilings? or 20? This activity alone will take days to pound every piling. This presents another hazard to the Public Health and Safety of this community.
10. Public Health and safety is a serious impact. Walking and trying to rest while traffic and pounding of pilings are constantly disrupting any form of relaxation. Signal and traffic congestion can also increase accidents to anybody caught in the congestion. Bicycle & E-

Bike accidents are part of the vehicular accidents and are all part of the Health and Safety discussion. The total pressure of circulation and access will increase dramatically.

11. Stress from using Uber and Ride Share services. Stress from trying to find another Pharmacy and Grocery Store. The longterm impact on the community will rise.

**Public Health and Safety is a compelling reason for a Moratorium.**

Let's look at what is right:

**Nothing..... Except this property is old and needs to be redeveloped.**

**What can we do about it:**

A. **City Council can Adopt a Moratorium to pause the rush.** This pause will allow for staff to continue the review to correct the errors, and provide the missing public out reach. The City and the developer can hold a series of Community Stake Holders Workshop's to resolve issues and possibly improve this project. A moratorium would require a 5-4 vote by City Council to approve a Moratorium. Planning Commission can recommend this as a solution.

B. The project **could be approved in 2 stages.** Stage 1 would be to build part of the project. That is: The 5 story parking structure, and only 1/2 of the proposed apartments, and the commercial component. Stage 2, **If - the project is determined to be successful and if - the parking and circulation work out, (the project) can build the final portion of apartments.** This is a risk on the developers side and also a commitment on the City's side to support the Senate Bill 330. If there are any issues or changes to improve the project both the City and the Developer can modify the project without an additional public hearing.

Please consider my suggestions

Clyde Wickham, Former Current Development Engineer, Carlsbad