



August 31, 2017

To:

Carlsbad City Council council@carlsbadca.gov

Carlsbad Parks & Recreation Commission at mike.pacheco@carlsbadca.gov

Carlsbad Planning Commission at Don.Neu@carlsbadca.gov

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Subject: City Park Standard in Southwest and South Carlsbad

Dear Carlsbad City Council:

The San Pacifico Community Association (SPCA) represents over 450 homes (around 1,000 Citizens) in the Southwest Quadrant/Park District of Carlsbad, and is the primary component and stakeholder of the Poinsettia Shores Planned Community (Poinsettia Shores Master Plan and Local Coastal Program). SPCA supported the residents in creating the Ponto Beachfront Development Review Committee (PBDRC) to:

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

Since PBDRC has been formed there has been a growing participation and concurrence from other Carlsbad areas and groups on the consensus PBDRC has consolidated.

PBDRC and the SPCA are pleased that the City has taken action to fix a timeline defect in the Growth Management Program related to meeting a City Park standard. However there is another truly once in a lifetime opportunity to improve how the City Park standard is proposed to be met in Ponto and coastal South Carlsbad that we would like to request of the City Council. This opportunity stems from the fact that Ponto is the only vacant coastal land in South Carlsbad and is currently being evaluated for low-priority housing and other types of development. Should it be developed in this way, there will never be another opportunity to have a meaningful park in coastal Southwest Carlsbad west of Interstate 5. The request is to work with Pontolocals to provide a comprehensive and open process for citizens of the City [primarily Southwest and Southeast Carlsbad Citizens] to discuss and define possible better approaches to implement a coastal park in Southwest that can serve all of South Carlsbad. We recently had a community meeting attended by approximately 200 people and this letter reflects some of the near unanimous (90%+) concerns from that meeting. We believe these concerns are also likely to be reflective of many others living in South Carlsbad, and also in North Carlsbad.

The City Park Standard is “3.0 acres of Community Park or Special Use Area per 1,000 population **within the Park District**”. So for every 1,000 Citizens in a Park District, such as the coastal Southwest Quadrant Park District, there is to be 3 acres of City Park to meet the standard. The rationale for such a location specific standard is that parks should be distributed so as to be reasonably accessible by all citizens. It is also important to have reasonable and safe park access via walking and biking, not just by motor vehicles. The staff report on correcting the timeline defect in the Park Standard stated that correcting the timeline to correct the park quadrant deficits is “... specifically relevant to the southwest and southeast quadrants. As stated in the report a need for more park acreage in those two quadrants was identified four years ago (during FY 2012-13).” A 6.6 acre park deficit within the Southwest quadrant was identified in the Growth Management Monitoring Report for FY 2014-15. However the report indicates that “Based on the Fiscal Year 2015-16 Capital Improvement Program list of projects, Veteran’s Memorial Park (91.5 acres, with 22.9 acres applied to each quadrant) is proposed to be constructed prior to buildout.” Under this proposal the future Veteran’s Park, that is located in the Northwest Park District and located many miles away from the coastal Southwest and Southeast Quadrants and Park Districts, would be used to meet the population and citizen demand for Parks for citizens within the coastal Southwest and Southeast Quadrant’s Park Districts. We know there is an outstanding opportunity for the City to do a great thing for the community and to add tremendous value to the quality of life by augmenting, enhancing, and/or adjusting planned park supply to better serve citizens and the City; and be more consistent with the General Plan and core values of the Growth Management Plan.

The fundamental intent of creating four Park Districts (one for each quadrant) and managing and matching demand and supply of City Parks into smaller geographical areas (quadrant park districts) is to make the supply of City Parks reasonably accessible to their demand and more equitably distributed for citizens. Equitable distribution of City Park facilities is the right thing to do and has many citizen and city benefits:

- Children and elderly can more easily walk and bike to City Parks when they are close by and within a safe walking and bicycling distance with properly designed access pathways;
- Park supply created so far away from park demand creates the need to drive in a car to access the park, thus increasing vehicle miles traveled (VMT). Depending on locations this also limits park access for citizens without cars or unable to drive;
- When city parks are accessible to their demand by walking/bicycling then less city park land is needed to park cars. Citizens get more actual useable park space for each acre of park land;
- When city parks are close to their demand busy families can quickly get to them after their workday which allows more park time for families during busy weekends;
- Nearby city parks create a stronger sense of stewardship for the “neighborhoods” park and city parks in general. Citizens watch out and care for their nearby park;
- Nearby city parks that are equitably distributed and based on surrounding neighborhood demand serve to strengthen neighborhood quality and property values by providing park amenities close by. It is both a good neighborhood and economic development strategy to assure park demand and supply are locationally matched; and
- Fundamentally it is the right thing to do to place park demand and supply in close proximity to each other and promote and equitable distribution public facility demand and supply.

In coastal Southwest Carlsbad and South Carlsbad we have some glaring gaps in demand and supply of city parks. For instance:

The Carlsbad General Plan Open Space, Conservation and Recreation Element, Figure 4-3 Parks: Shows no existing or planned coastal parks or special use areas west of Interstate 5 for all of South Carlsbad. In North Carlsbad there are 10, parks and special use areas west of Interstate 5 and on or close to the beach (9 of these are existing parks and 1 is a future park). This seems a clear and inherently unfair distribution of coastal park facilities. This unfair distribution severely reduces critical access to coastal park open space near the beach for South Carlsbad Citizens (half the City and over 26,000 homes, and over 64,000 citizens).

This unserved demand for city park space in coastal South Carlsbad is evidenced by the dangerous use of the Carlsbad Boulevard [old highway 101] road shoulder and bike lanes and campground road for recreational purposes, parking demand and the frequent unauthorized recreational use of Ponto vacant land. People are using whatever land they can for needed recreational use. South Carlsbad Citizens in Aviara, La Costa, Rancho Carrillo, Bressi Ranch, La Costa Valley and all the other South Carlsbad inland neighborhoods have no coastal South Carlsbad City Beach Park areas to access the coast. Their only option is to drive significant distances (with increase VMT and greenhouse gas emissions) crosstown to access city beach parks in the North, or travel to Encinitas. This forces increased VMT and greenhouse gas emissions which is counter to both State and General Plan goals. Citizens in South Carlsbad only have a State Beach pay parking lot and a retreating primarily steep cobble beach as their "local" beach. The non-beach portion of the South Carlsbad State Beach campground is a road and lodging facility for primarily out-of-town visitors that are near this beach. It is not a city park. The Campground is not designed to serve the park needs of Carlsbad citizens, but is a great place primarily for visitors to affordably pay to spend nights camping near the beach. The lack of any park facilities at the campground is evidenced by the frequent use of the campground driveway (a significant area of the campground) by children and adults as a play area.

There is an added benefit in that adding a coastal South Carlsbad Ponto Beach Park would help alleviate growing overcrowding, and increased traffic and parking congestion at North Carlsbad's coastal parks.

Citizens west of Interstate 5 in South Carlsbad have very limited access to a city park. Depending on the neighborhood one lives in, access our nearest park [Poinsettia Park] is between a 2 to 4 mile trip. Residents must cross Interstate 5 using one of only two crossings in the space of over 3 miles. These crossings are on major multi-lane, higher speed roadways (Poinsettia Lane or Palomar Airport Road). The route is not the most safe or direct, and it forces one to drive in a vehicle to access a park which increases VMT. Park access for children, the elderly, and those walking dogs west of Interstate 5 in South Carlsbad is severely restricted or effectively eliminated.

Coastal Southwest and all of South Carlsbad have not met their quadrant's Park area standard since 2012 (per the City's Growth Management Program). A specific comprehensive and open discussion with the Southwest and all of South Carlsbad citizens on how that deficient should be resolved should occur. The current City solution to meet local park needs of coastal Southwest and South Carlsbad with a paper allocation of park acreage in the Northwest part of the City that is many miles away does not seem right. It seems inconsistent with the core values and Vision of our City.

From Carlsbad General Plan Community Vision:

"...the Carlsbad Community Vision, which is the foundation for this plan." This is the foundation for the General Plan.

“...In the future, ... social connections will be enhanced through ... more public gathering places, family-friendly activities, and open spaces within walking distance of people’s homes ...”

“The community is proud of the exceptional amount of open space in the city, and envisions a future of continued City commitment to open space protection and strategic acquisitions to further the city’s open space system.”

“Parks, Fields, and Facilities for All Ages: The network of parks and recreation facilities will be improved to meet the community’s active lifestyle needs. Such improvements may include the strategic addition of more parks, ... New facilities will be located to maximize use and access by all neighborhoods, tailored to the needs of local populations, and designed with all ages in mind.”

“Beach Uses and Improvements: The beach is an important outdoor recreational resource, and protecting and enhancing access to the beach and the quality of the beach experience is a top community priority.”

“ ... Access to the beach and the quality of the beach experience will be improved through new compatible and supportive uses on or in close proximity to the beach, which may include ... a park ...”

“Tailored Tourism Strategy: Tourism is an important component of the city’s economy today, and it remains an attractive economic sector for the future since it emphasizes the very resources that make the city attractive to existing residents—the ocean and beach ...”

“Easy and convenient pedestrian connections will be available from every neighborhood to help children get safely to schools and parks.”

From General Plan Land Use Element:

“Beach Access and Activity: ...the community expressed an overwhelming preference for an active waterfront development strategy, which provides opportunities for activities and uses to be more integrated with the ocean. ... Access to the beach will be enhanced through ... open space, parking, and amenities ...”

General Plan Land Use Policy: “2-G.20 Develop an active ocean waterfront, with new growth accommodated west of Interstate 5, to enable residents and visitors to enjoy more opportunities for ... recreating along the coastline. Develop public gathering places and recreational opportunities along the coastal corridor.”

The City’s Park and Recreation Master Plan includes many areas of direction that strongly support a coastal park west of interstate 5 in South Carlsbad. Many of the most important park facilities and program needs identified in the City’s Park and Recreation Master Plan could be most efficiently addressed with a coastal park in the Ponto area. There are also significant and unique opportunities to create both public/private and public/public partnerships that would not only help reduce City recreation costs but also expand and create unique and special recreational program opportunities currently identified in the City’s Park and Recreation Master Plan.

A Ponto city coastal park also implements a major General Plan policy which calls for an active waterfront and creates solutions to long standing Local Coastal Program policy and State Parks Campground issues. There are very unique and special land use compatibility opportunities and synergy from a coastal city park in south Carlsbad and Ponto area that are inline and implement high priorities identified in the City's Park and Recreation Master Plan.

In summary, Carlsbad has a once in a generation opportunity to create very special coastal South Carlsbad Ponto Beach Park in South Carlsbad. This opportunity will be true to our Carlsbad Community Vision and General Plan and the heart and soul of our Growth Management Plan's standard of matching park demand with park supply within a particular park district. We believe this request benefits not only coastal Southwest Carlsbad and South Carlsbad but all of Carlsbad and is more consistent with the City General Plan, Growth Management Program, and Parks Master Plan and will result in a better, more valued and more sustainable City.

We are a key Stakeholder in Ponto and the Poinsettia Shores Maser Plan and Local Coastal Program. We have been hearing similar concerns from other Carlsbad citizens about coastal beach park access and request that the City Council seize this opportunity to work with us to establish a comprehensive and open community discussion about the strategic acquisition of a coastal South Carlsbad Ponto Beach Park for South Carlsbad citizens and businesses. We also request before a solution to the 2012 Southwest quadrant park standard deficit is created we have an open citizen discussion with the Citizens of coastal Southwest Carlsbad on how that solution can better address the park demand created in the Southwest Park District with a better park supply created within that District. Like our City Park Standard says: "3.0 acres of Community Park or Special Use Area per 1,000 population **within the Park District**". We request that a coastal City Park West of Interstate 5 be developed in South Carlsbad to be fair and equitable and to meet the needs of South Carlsbad for a coastal City Park to serve all the Citizens of South Carlsbad. This can take advantage of special land use synergies to help promote public/private collaboration, create added property and transit occupancy tax revenues for the City by creating a valuable and synergistic amenity [where none now exists] for over half the City and over 26,000 homes, along with providing support to our City's visitor serving businesses and activities. It is the right and smart thing to do.

The San Pacifico Community Association and PBDRC as key Stakeholders in Ponto wish to be a key participant any proposed City or CCC actions regarding these subjects, and would like to meet with you to see how we can discuss and advance this for the benefit of South Carlsbad Citizens. As we are citizen volunteers we sincerely appreciate advance notification to allow for preparation and coordination with our work lives and to communicate back to our members and other South Carlsbad Citizens. We wish to be notified in advance of any proposed actions related to the issues in thus letter. The San Pacifico Community Association contact information is:

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The Ponto Beachfront Development Review Committee conducted the research cited in this letter. Along with general communications, please contact the following if you have technical questions regarding this letter. Key Committee contact information is:

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Thank you for your consideration.

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