

**Mia De Marzo**

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**From:** Steve Linke <splinke@gmail.com>  
**Sent:** Monday, May 3, 2021 3:53 AM  
**To:** City Clerk  
**Subject:** 5/4/2021 City Council meeting: West Oaks project public comment  
**Attachments:** 2021-05-04 CC West Oaks public comment - Linke.pdf

All Receive - Agenda Item # 4  
For the Information of the:  
CITY COUNCIL  
Date 05/03/21 CA X CC X  
CM X ACM X DCM (3) X

Clerk,

Please include the attached correspondence as part of the public record for the West Oaks public hearing at the 5/4/2021 City Council meeting, and please distribute it to the City Council and other interested parties. There is no need to include this cover email.

Best regards,  
Steve Linke  
Carlsbad, CA

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May 3, 2021

Re: 5/4/2021 City Council meeting - West Oaks project public hearing

Honorable Mayor and Councilmembers:

Thank you for the opportunity to provide these additional comments and recommendations on the deficient West Oaks transportation studies and mitigation plan. Please see my public comment to the Planning Commission (Exhibit 11 of the current staff report) for additional details, and I will address staff's and the applicant's consultant Fehr and Peers' response (Exhibit 12) herein.

### **Deficient Unbundled Parking Program**

About two-thirds of the proposed vehicle miles traveled (VMT) mitigation for West Oaks allegedly will be achieved with an unbundled parking strategy (charging for parking separately from rent). A calculation was made based on "procedures and research" in the CAPCOA guidelines<sup>1</sup>, claiming that charging \$100 per month to the residents of the 192 apartment units will reduce overall vehicle ownership from an estimated 315 vehicles down to 275 (a net reduction of 40 vehicles). This translates to a very optimistic 10.2% reduction in VMT, which is near the maximum that can be claimed for this strategy.

However, the success of unbundled parking relies on the availability of viable alternatives to vehicles and ease of access to destinations. In this case, the proposed single shared car and eight shared bicycles are not a realistic substitute for 40 vehicles, and the availability of County or City ridesharing programs or transit is highly speculative at this point. Further, unlike downtown or mixed-use locations that are within easy walking or biking distance of many destinations, this industrial designated site is not conducive to a "residential" unbundled parking program given its distance to most key destinations.

It also notable that the cited research for this strategy in the CAPCOA guidelines was largely done on sites in the United Kingdom, which bear little resemblance to this project, and the calculation was based almost exclusively on the price (\$100) without accounting for availability of transportation alternatives or proximity to key destinations.<sup>2</sup> This is not a good strategy for this location, and staff and the applicant have not addressed these concerns.

### **Meaningless monitoring of environmental impacts**

All of the flaws in the unbundled parking program described above could be instantly erased by simply limiting resident parking to the 275 spaces claimed, as would typically be the case. Instead, the applicant is being allowed to build 306 resident spaces plus 78 guest spaces. Alternatively, the program could be *monitored* to ensure that the ownership goal is being met—with required changes to the overall mitigation plan or penalties if it is not. That is how it is being done in other cities but not in Carlsbad.

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<sup>1</sup> California Air Pollution Control Officers Association (CAPCOA), *Quantifying Greenhouse Gas Mitigation Measures*, August 2010: <http://www.capcoa.org/wp-content/uploads/downloads/2010/09/CAPCOA-Quantification-Report-9-14-Final.pdf>

<sup>2</sup> CAPCOA guidelines measure PDT-2, pp. 210-212

