

**Mia De Marzo**

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**From:** Howard Krausz <hkrauszmd@gmail.com>  
**Sent:** Monday, May 3, 2021 9:06 PM  
**To:** City Clerk  
**Subject:** Agenda item #4, West Oaks  
**Attachments:** NCA Letter re\_ West Oaks.docx.pdf

All Receive - Agenda Item # 4  
For the Information of the:  
CITY COUNCIL  
Date 05/04/21 CA ✓ CC ✓  
CM ✓ ACM ✓ DCM (3) ✓

Please accept the attached letter from North County Advocates in advance of tomorrow's City Council meeting.

Thank you,

Howard Krausz, MD

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# North County Advocates

7668 El Camino Real, Suite 104-258, Carlsbad CA 92009

Honorable Mayor and City Council

On February 24, 2021 North County Advocates notified the city via certified mail that they were in violation of the terms of our settlement agreement over the General Plan, specifically related to TDM. Our letter stated that the city was in violation for two reasons:

1. The TDM Plan and Ordinance are insufficient to meet the goals and targets of the CAP Measure K
2. The City has failed to adequately implement, monitor and enforce the TDM Plan and Ordinance.

We have received no response to that letter, and no indication that the city intends to take any corrective action. Regarding the TDM issues with the West Oaks project, the city staff analysis and response to the detailed critique by Steve Linke of the Carlsbad Traffic and Mobility Commission (T&MC) show that there is little intent to take these issues seriously before approving such a large development.

The transportation sector accounts for almost half of the community wide GHG in the city of Carlsbad. CAP Measure K was one key action adopted to address those impacts. It sets a specific target for GHG reductions to be achieved through Measure K, TDM. The TDM actions staff is proposing for the West Oaks project are insufficient to achieve the required GHG reductions for that project. Furthermore, the monitoring program is not consistent with CEQA requirements to ensure that the adverse impacts of these GHG emissions have been mitigated.

The city will not meet the GHG reductions required for CAP compliance if they keep approving projects that fail to meet the basic project level requirements.

We ask you to :

1. Require meaningful TDM measures and monitoring for the West Oaks project that ensure the required GHG emission reductions are achieved, or corrective action is taken- for the life of this project.
2. Direct staff to meet and confer with North County Advocates to address the issues raised in our letter of February 24, 2021.
3. Ensure that 15% of the developable land in LFMZ 5, where West Oaks is located, will remain open space as required by the GMP and no critical habitat will be destroyed.

Thank you in advance for taking these actions and supporting Carlsbad's plan to address the climate crisis.

Sincerely,

Howard Krausz, President  
On behalf of North County Advocates