

- State of California receives the U.S. Government SRTS Grant funds and provides those funds to the counties applying for them. The San Diego Association of Governments (SANDAG) provides funds to the 16 cities in San Diego County, including Encinitas. The city of Encinitas however has installed “traffic calming measures”, i.e., rubber speed bumps. The installation of speed bumps is a far cry from the intent of the U.S. CDC SRTS program. The County of San Diego Health and Human Services Agency (HHS) Healthy Works Program has a Plan organized around three (3) focal points.
 - a. Existing Issues and Opportunities
 - b. Existing Safe Routes to School Efforts, and
 - c. Moving Forward – A Regional Safe Route to School Strategy

3.7.3 Analysis of Project Effects and Determination as to significance. Presently it is very dangerous and hazardous for children living in the existing residential community to walk to Capri Elementary School, a Grade K-6 school. The reason for these conditions is the absence of sidewalks, controlled crosswalks, street lighting and stop signs. Notwithstanding the ability of handicap students from accessing Capri School via the SRTS, programs.

- Further, the Encinitas School District does not provide transportation services for the 740 Capri Elementary School, students, nor guarded crosswalks for those students who prefer to walk to school.
- The construction of the *Piraeus Point Townhomes* will without a doubt exacerbate the current “Safe Route to School” issue(s). The total lack of the City of Encinitas to provide for a meaningful SRTS program is a quantifiable negative significance per CEQA.

3.7.4 Cumulative Impact Analysis. The ECC suggests a small private transit bus be provided by *Piraeus Point Townhomes* Homeowner’s Association in perpetuity, to pick up and drop off the resident children to comply with the U.S. Government and SANDAG SRTS program

- This type of private transit vehicle for school children (K-6) service has been initiated for the Fox Pointe Development project, located in the City of Encinitas.
- It is to be noted that Capri School is at 95% capacity, whereas it is most likely that K-6 students will have to be transported to other K-6 public schools in the Encinitas Unified School District. This requirement will add to the residents transportations costs, increase vehicle trips per day and exacerbate the current Air Quality contaminant pollution issues in the community.
- Complete Streets Concept, Policies and Practices need to be considered in order to seriously consider the intent of the SRTS Programs. Complete Streets may vary significantly between urban, suburban and rural contexts but all are designed to balance safety and convenience for everyone using the road. By modifying polices so that the transportation system includes the needs of people on foot, those with disabilities, public transportation and bicycles, the City of

Encinitas shall provide more options for people in the community. Making these options more convenient, attractive and safe allows people to choose their preferred mode of travel rather than going straight to their automobiles. Ref. California SRTS State Network Complete Streets Action Team. National Complete Streets Coalition.

3.8 Transportation and Circulation

3.8.1 Existing Conditions. The Developer shall work with Caltrans to open Piraeus Street at the south end intersection onto Leucadia Blvd., for ingress and egress of traffic. Caltrans stated in 1989 when closing the south bound Piraeus Street traffic to Leucadia Blvd., it would only be reopened if supporting data were provided. Since closure, the residential roads have seen a dramatic increase in traffic warranting the City to install “Traffic Calming Measures” i.e., speed bumps, based on citizen complaints.

3.8.2 Regulatory Framework. Apply San Diego County Traffic and Circulations Guidelines. There shall be no vehicle ingress or egress onto Plato Place from this project. Exception: SDG&E existing 16ft. recorded easement access via Plato Place and the use by emergency vehicle(s)..

3.8.3 Analysis of Project Effects and Determination as to Significance. Should 149 *Piraeus Point Townhomes* be constructed to allow additional vehicle traffic onto Piraeus Street, causing extreme congestion along Piraeus Street? The ECC states no.

3.8.3.1 The 980 +/- daily vehicle trips (see below) will dramatically increase the “cut-through” traffic to the detriment of the existing residential community, specifically Normandy Road. As noted, it is again requested that Lennar Homes (who coincidentally constructed approximately 30 single family homes on Normandy Road 8-years ago) can provide expertise and knowledge towards this (Caltrans-City of Encinitas) important Leucadia Blvd., reopening issue.

3.8.4 Cumulative Impact Analysis. Additionally, the number of daily vehicles trip from the *Piraeus Point Townhomes* project will be 300 vehicles multiplied by a factor of six (6) equals 1,800 vehicle daily trips.

- An allowance factor for service vehicles will also increase and exacerbate the traffic volume issue on Piraeus Street by a factor of 1.1 +/- for an estimated total of 1,980 daily vehicle trips. This increase in vehicle traffic from *Piraeus Point Townhomes* will seriously impact the intersections of Piraeus Street and La Costa Avenue resulting in a Level of Service (LOS) of a F-Rating. The intersections of Plato Place, Olympus Road, Sparta Road and Normandy Road will also be impacted.
- Traffic interference will occur from *Piraeus Point Townhomes* vehicles entering Piraeus Street to travel south along Piraeus Street. Those vehicles traveling south to Normandy

Road will interfere with northbound vehicles from Leucadia Blvd. Normandy Road is the only easterly route for vehicles to access Leucadia Blvd, which provides access to I-5 south. As noted, access to Leucadia Blvd., is blocked from Piraeus Street.

- Traffic interference will occur from *Piraeus Point Townhomes* vehicles entering Piraeus Street to travel north to La Costa Avenue. This vehicle traffic increase will seriously impact the intersection of Piraeus Street and La Costa Avenue and create congestion. Synchronizing the three (3) way signals serving both eastbound and westbound traffic on La Costa Avenue will also cause and create delays at the three (3) locations. Currently the traffic on Piraeus has a lower signal (Green) duration time permitting 7 vehicles to enter the intersection. With an increase of hundreds of vehicles north bound to access I-5 north and south the delays will be horrendous, frustrating and potentially dangerous. Traffic entering Piraeus Street from Sky Loft Road to either travel south or north will be impacted severely by the huge line of vehicles waiting in line to get through the Piraeus Street and La Costa Avenue intersection. The impact of vehicle congestion will also increase the emission pollutants, of benzene, carbon monoxide, particulate matter at this intersection. The prevailing wind is from the SW to the NE. The recipient of these air borne pollutants is Batiquitos Lagoon, contiguous with La Costa Avenue, where significant reportable toxic pollutants of Poly Aromatic Hydrocarbons (PAH) are present in the water and benthic layer as per the December 9, 2021, water sampling analysis.
- *The ECC believes the Lennar Draft Scoping EIR does not address The Public Services and Facilities concerns as identified herein and therefor the responses are deemed inadequate. The Safe Route to School is a significant issue and shall be addressed.*

3.9 UTILITIES and SERVICE SYSTEMS

Existing Conditions. This section discusses the proposed project relative to utilities and service systems, comprising wastewater, water, stormwater,

3.9.1 Wastewater. The ECC concern is the current and future capacity of the existing 70-year old 8-inch VCP gravity sewer line owned and operated by Leucadia Water District (LWD). The Piraeus Street wastewater/sewer line serves the community.

- The Piraeus Street 8-inch diameter VCP gravity wastewater/sewer line flows from Leucadia Blvd., (south point of beginning) to La Costa Avenue (north) and connects to an existing 12-inch gravity flow sewer line. The Piraeus Street 8-inch gravity sewer line enters a manhole north of Sky Loft Road. This manhole known as the Sky Loft manhole also receives waste water flows from an existing 12-inch gravity sewer line located vicinity of Sheridan Road on La Costa Avenue west of I-5, which flows east to I-5 then flows south parallel to I-5 then flows easterly under I-5 to the Sky Loft manhole. A 12-inch VCP gravity sewer line flows north from the Sky Loft Manhole to La Costa Avenue and flows east to a pump station.

- Per the 1968 LWD Civil Plans, a 12-inch forced main flows from the pump station(s) east to west along La Costa Avenue to Piraeus Street and follows the route of the 12-inch gravity sewer line, as noted. The 12-inch forced main is routed around the perimeter of Batiquitos Lagoon crosses over the La Costa Avenue NCTD railroad bridge then flows north and parallel to the North Coast Hwy. 101 Batiquitos Pump Booster Station, then flows north to the Encina Wastewater Authority's (EWA) Water Pollution Control Facility in Carlsbad. Verification is required.

3.9.2 Analysis of Project Effects and Determination as to significance. The existing 8-inch Piraeus Street VCP gravity sewer line receives all wastewater flows from residences in the area known as "Crest Acres" east of Piraeus Street, including Capri Road, Capri Elementary School (740 students) Caudor Road, Gascony Road, Burgundy Road, Skyloft Clusters PUD, Monte Mira PUD, Olympus Road, Normandy Road, etc., and south to Leucadia Blvd.

- The proposed *Piraeus Point Townhomes* 149 Equivalent Dwelling Units (EDU's) - with a potential population of 455 or more, persons - new connections having the potential to disrupt wastewater flow. The ECC is very much concerned with the present capacity let alone discharging an additional approximately (455 persons x 75 gallons/day) equates 34,125 gallons per day into a 70 year +/- 8-inch gravity flow sewer line.

3.9.3 Cumulative Impact Analysis. Can the existing Piraeus Street 8-inch diameter VCP wastewater/sewer line receive the proposed 149 Equivalent Dwelling Units (EDU's) - with a potential population of 455 persons with - new connections without having the potential to disrupt wastewater flow?

3.9.3.1 Residents in the LWD area strongly oppose subsidizing the costs of any new sewer lines infrastructure through an increase in LWD fees due to the construction of the *Piraeus Point Townhomes*. These costs, if any, shall be reimbursed by the applicant to LWD either through connection fees or direct reimbursable capital improvement (CIP) costs.

3.9.3.2 Water.

Existing Conditions: The San Dieguito Water District (District) is one of two water districts that serve the City of Encinitas (City), which includes the communities of Old Encinitas, New Encinitas, Leucadia, Cardiff, and Olivenhain. The District provides potable water and recycled water to approximately 38,000 customers within its service area, while Olivenhain Municipal Water District (OWMD) serves the rest of the City. The Districts water supply portfolio includes local surface water from Lake Hodges, purchased treated and raw water from the San Diego County Water Authority (SDCWA), and recycled water produced by surrounding wastewater agencies with tertiary treatment.

Projected water demand for the SDWD for all water use sectors except for agriculture were adjusted to

increase proportionally with population growth. Table 3.9.3.2 shows the projected population served by the SDWD from 2020 to 2045.

TABLE 3.9.3.2 CURRENT AND PROJECTED POPULATION (Calendar Year Data)

Population Served	2020	2025	2030	2035	2040	2045
	37,856	39,208	39,653	39,800	40,240	41,246

Source: SDWD 2020

The Urban Water Management Planning Act requires every urban water supplier to assess the reliability of its water supply for normal, single dry, and multiple dry years. Single-dry and multiple-dry year conditions were based on the SDWD’s historical water use records. Table 3.9.3.3 shows the SDWD’s estimated water supply projections from 2020 to the year 2045.

TABLE 3.9.3.3 TOTAL WATER DEMAND IN ACRE-FEET PER YEAR

	2020	2025	2030	2035	2040	2045
Potable and Raw Water	5,463	5,796	6,156	6,243	6,404	6,611
Recycled Water Demand	642	700	700	700	700	700
Total Water Demand	6,105	6,496	6,856	6,943	7,104	7,311

Source: SDWD 2020

3.9.3.4 Analysis of Project Effects and Determination as to significance. *The Piraeus Point Townhomes* will use an average of 75 gallons per person per day. (per the current Water Agencies Standards, Section) including the irrigation water for drought tolerant plantings and trees. Based on this capita per day usage the overall volume of water that will be consumed by this project equates to approximately 38 acre feet. This project will impact significantly the City’s water resources currently three (3) years in a State wide Level 1 drought.

- **Drought Issues.** Currently a Level 2 advisory water reduction is in effect for all SDWD customers until June 10, 2023. Level 2 means each customer shall voluntarily reduce their water consumption by 10% and limit landscaping irrigation to functional use only. It appears incongruous that major residential projects that will consume more than 38 acre feet are being considered or worse approved, while existing customers are reducing their usage due to a drought condition. At the very least a moratorium should be enacted on all construction projects during the 3rd year of a State wide drought condition.

3.9.3.5 Cumulative Impact Analysis. This project will have a significant negative impact cumulatively, to the City's water resources, i.e., SDWD and the wastewater system, i.e., LWD.

- *The ECC believes the Lennar Draft Scoping EIR does not address the Utilities and Services Facilities concerns as identified herein and therefore the responses are deemed inadequate*

3.9.3.6 STORMWATER

Existing Conditions. The project site is undeveloped vacant land and therefore any and all rainfall is absorbed by the soil to the point of saturation whereby surface water would flow on to Plato Place at the south, to Piraeus Street at the west and into the natural ravine at the north property line. Contiguous properties to the east property line surface waters may possibly flow onto the project site depending upon the grade elevations, which are variable.

The location of the project is within the Vulcan Watershed which drains to Batiquitos Lagoon via an 18-inch diameter outfall north of La Costa Avenue 200 feet east of Vulcan Rd.

3.9.3.7 Analysis of Project Effects and Determination as to significance. The ECC requests that the surface water discharges from *Piraeus Point Townhomes* subjected to a 2, 5, 10, 25, 50 and 100 year storm events be calculated per Civil Engineering Guidelines for coastal San Diego County and in accordance with but not limited to, California Title 24 and the City of Encinitas Municipal Code.

The *Piraeus Point Townhomes* stormwater shall be pretreated prior to being discharged to the stormwater piping system. Stormwater overflows shall be conveyed off site to an approved Best Available Control Technology (BACT) hydromodification pretreatment/retention location, possibly to the contiguous mitigation target property Parcel B.

- Currently impervious surface water runoffs flowing from Caudor Street and roads north of Capri Road flow east to west then north to south and south to north respectively, flowing onto Plato Place. The Plato Place stormwater flow is conveyed via open earth ditches, concrete channels and culverts, discharging downgradient in a westerly direction to a point of convergence. This convergence point is located south of Plato Place and east of Piraeus Street. A culvert under Piraeus Street drains the converging flows in a westerly direction and then flows north within the boundaries of the Interstate-5 Freeway through a series of RCP pipes, culverts and catch basins, to the 18-inch diameter Vulcan Outfall at Batiquitos Lagoon, as noted.
- The ECC respectfully, requests the engaged Civil Engineering Consultant determine how the noted stormwater discharge will be enhanced and conveyed including the stormwater overflow

from *Piraeus Point Townhomes*. Such enhancements or modifications shall not create a condition detrimental to the existing stormwater discharges of the ECC, area, e.g., flooding.

- The ECC is aware of the use and installation of hydromodification basins, bioretention basins, stormwater storage cisterns, drywell(s) and the like. The concern is back-to-back high intensity inundation storm events that will create flooding due to the saturated soils inability to absorb additional stormwater over time, as noted. A case in point is just south of the intersection of Piraeus Street and La Costa Avenue the existing drainage area (west of Piraeus Street) presently floods during high intensity storm events. An issue that the City has failed to resolve.

3.9.4 Cumulative Impact Analysis. A peer review of the stormwater modeling/scenarios will be conducted by the ECC to verify the effectiveness of the stormwater design.

- *The ECC believes the Lennar Draft Scoping EIR addresses the Stormwater concerns as identified herein and therefor the response is deemed adequate*

4.0 PARKING ISSUES

a. There shall be no spillover or project owner or visitor parking allowed on Plato Place or Piraeus Street, as both are currently non-conforming rural roads. All cars whether residents or visitors or service delivery vehicles shall be parked on *Piraeus Point Townhomes* property only.

b. In the absence of sidewalks, - where curbs if installed can normally be painted red (to alert drivers of a no parking location) - e.g., Piraeus Street, Plato Place, Caudor Street and Capri Road all shall have new “NO PARKING” signs installed by the City per the CVC.

c. The *Piraeus Point Townhomes* project has the potential for one (1) vehicle per bedroom, i.e., 306, however with 149 Condominiums and where each Condominium has a 2-car garage this equates to 298 residential vehicles. Confirmation by the developer/applicant of the actual total residential parking calculated for the condominiums, is requested.

d. Additionally, and more importantly, please identify where the Visitor Parking will be located, including service vehicles, delivery vehicles, trash collection trucks, furniture moving vans, U.S. Post Office Delivery Vans, etc.

- *The ECC believes the Lennar Draft Scoping EIR does not address the Parking concerns as identified herein and therefor the responses are deemed inadequate*

5.0. LIGHTING

a. **Lighting.** Street Lamp Poles are required per the City of Encinitas SAC Meeting Report, on Piraeus Street only for the west property line parallel to Piraeus Street. However, the ECC is requesting that there shall be no pole lamps or roof-deck lighting or lights that project light into the night sky or the surrounding community. LEUCADIA is a DARK SKIES Community because of the sensitivity and close proximity to Batiquitos Lagoon. Therefore, external lighting shall be reduced or eliminated. The ECC discussed with Mr. Brian Grover that light bollards providing pathway lighting would most likely be acceptable.

b. **Rooftop Decks.** If constructed, these would add to Light and Noise pollution – please eliminate and do not include this intrusive addition. Further, barbecues on rooftops, if allowed, are a potential fire hazard, notwithstanding the nuisance cooking odors, an Air Quality issue.

- *The ECC believes the Lennar Draft Scoping EIR addresses the Lighting and the Rooftop Decks concerns as identified herein and therefore the response is deemed adequate*

6.0 TREES and PLANTINGS

a. The ECC believes that with the following setbacks: 1) A 60-foot set back along Piraeus 2) A 15-foot set back at Plato Place 3) A 16-foot east property line setback to accommodate the existing SDG&E high voltage overhead, wooden power poles 4) A 50-foot setback - per CEQA - from the ravine at the north property line will limit the available area for the planting of the required 30 native trees per acre. The total number of required trees is 180 +/- as per the City of Encinitas Municipal Code. Compliance may not be possible. All plantings shall be native drought tolerant and non-invasive.

b. Depending on the selected species of native trees and their size at maturity, they could possibly serve as an ambient noise buffer for the residents of *Piraeus Point Townhomes*, as well as providing shading.

c. The selection of indigenous coastal trees will enhance the project for the benefit of the community. It is to be noted in the City of Encinitas General Plan, the I-5 Interstate Corridor was established to be a “green corridor” on both sides. It is fitting towards keeping with the environmental objectives when the City of Encinitas became incorporated in 1986. Planting trees will be an enhancement for the City, the *Piraeus Point Townhomes* residents, and the community at large.

- *The ECC believes the Lennar Draft Scoping EIR addresses the Trees and Planting concerns as identified herein and therefore the response is deemed adequate*



7.0 Application Project Review. The ECC conducted a review of the Applicants package as follows:

a. The Preliminary Hydrology Study prepared January 19, 2022, is in error per **Section 1.2 Existing Conditions**. The subject property does not have greenhouses nor a single-family dwelling.

b. Section 1.3 Proposed Project. There is no connection to Sidonia Street from the local stormwater conveyance system.

c. Planned Application Supplement City of Encinitas Development Services Department Form S. A review of **Form S**, indicates that Parcel B is a strip of land that runs parallel to the east of a concrete drainage culvert contiguous with Piraeus Street north of Parcel A to south of Sky Loft Road thence from the north side of Sky Loft Road to La Costa Avenue. Parcel A area is 6.876 acres and Parcel B area is 4.93 acres. The parcels have been added to provide a gross acreage of 11.8 acres in order to meet the Encinitas Code Requirements *for Lot Coverage of 65% Maximum*. This procedure of adding the two (2) parcels is invalid per Appendix C- 2013-2021 of the City Housing Element. Only APN 254-144-01-00, i.e., Parcel A area 6.93 acres is shown on page C-8 as Cannon Property (Piraeus) Site Number 02. The “gross/net” acreage for development is 6.93 acres. Therefore, **Form S, Lot Coverage** calculations need to be revised and resubmitted to the City for review. See Appendices E.

d. Further, Parcel B area 4.93 acres, is totally unbuildable and is located within the City of Encinitas Subarea Plan of the MHCP Coastal Sage Scrub (CSS) and Southern Maritime Chaparral and California Gnatcatchers. Additionally, an SDG&E power pole with overhead 12.6 kV distribution power lines crosses the south portion of Parcel B between Sky Loft Road and Plato Place, as per a recorded easement and so noted within the Cannon Property Title Report.

The DRAFT Scoping EIR and Public Notices infer that Parcel A and Parcel B are enjoined and that the townhomes will be constructed on both parcels, which is totally false. The ECC requests that Lennar and the City refrain from using this false narrative. Further, the request to the Public Agencies requesting their input on the proposed Townhome project alluded to this false fact thereby seeking a favorable agency response. The ECC requests that the City resend their request to the Public Agencies indicating their error as described in paragraph D and thereby seek a new Public Agency response.

Additionally, The City Housing Element Inclusionary Economic Analysis specifically for Townhomes - see pages 88-90/420 – indicate the allowable density of Townhomes is R-15, i.e., maximum of 15 townhomes per acre. Therefore, with approximately 4 acres of buildable acreage a quantity of 60 Townhomes is most likely the maximum quantity allowed for Parcel A.

8.0 CONCLUSION.

Please be advised that this project is not welcomed by the surrounding community. It is ill-conceived, and if constructed, will be a permanent and irreparable detriment to the existing community.

Piraeus Point Townhomes development will have **significant environmental impacts** within the Visual Scenic Corridor resulting from the destruction of this existing valuable wildlife habitat inland bluff. This project can not be perceived as a community benefit and shall be denied.

The ECC, as a Community Stakeholder, requests that they be kept informed in every stage of this pending development.

The ECC respectfully requests that Mr. Brian Grover and Mr. David Shepherd of Lennar Inc. exercise a thorough due diligence process including the evaluation of the multitude of critical issues that the ECC Draft Scoping EIR Review clearly identifies and describes. Each of these significant issues have to be addressed and resolved by Lennar Homes and the City to the satisfaction of the ECC. The ECC firmly believes that with careful and respectful evaluation, Lennar Homes will conclude that Piraeus Point Townhomes housing development project is neither an economical financial risk nor is it environmentally justifiable, that a major U.S. public corporation would be proud of. Further, when weighing each of the described CEQA categories, their sub-sets, the quantifiable data, Lennar Homes will be guided to choose not to exercise their “option to purchase” the Cannon Property and thereby avoiding to construct this “negative quality of life” constrained property

**END OF THE ECC SCOPING DRAFT ENVIRONMENTAL IMPACT REPORT
REVIEW**

Appendices A

La Costa Fault Map

Appendices B

Ambient Traffic Noise Measurement/Location Map

Appendices C

Aerial Photos of Agricultural Activity

Appendices D

North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program Mitigation Site Assessment for the La Costa Preservation Parcel. Prepared by Dudek for Caltrans, and SANDAG August 2012

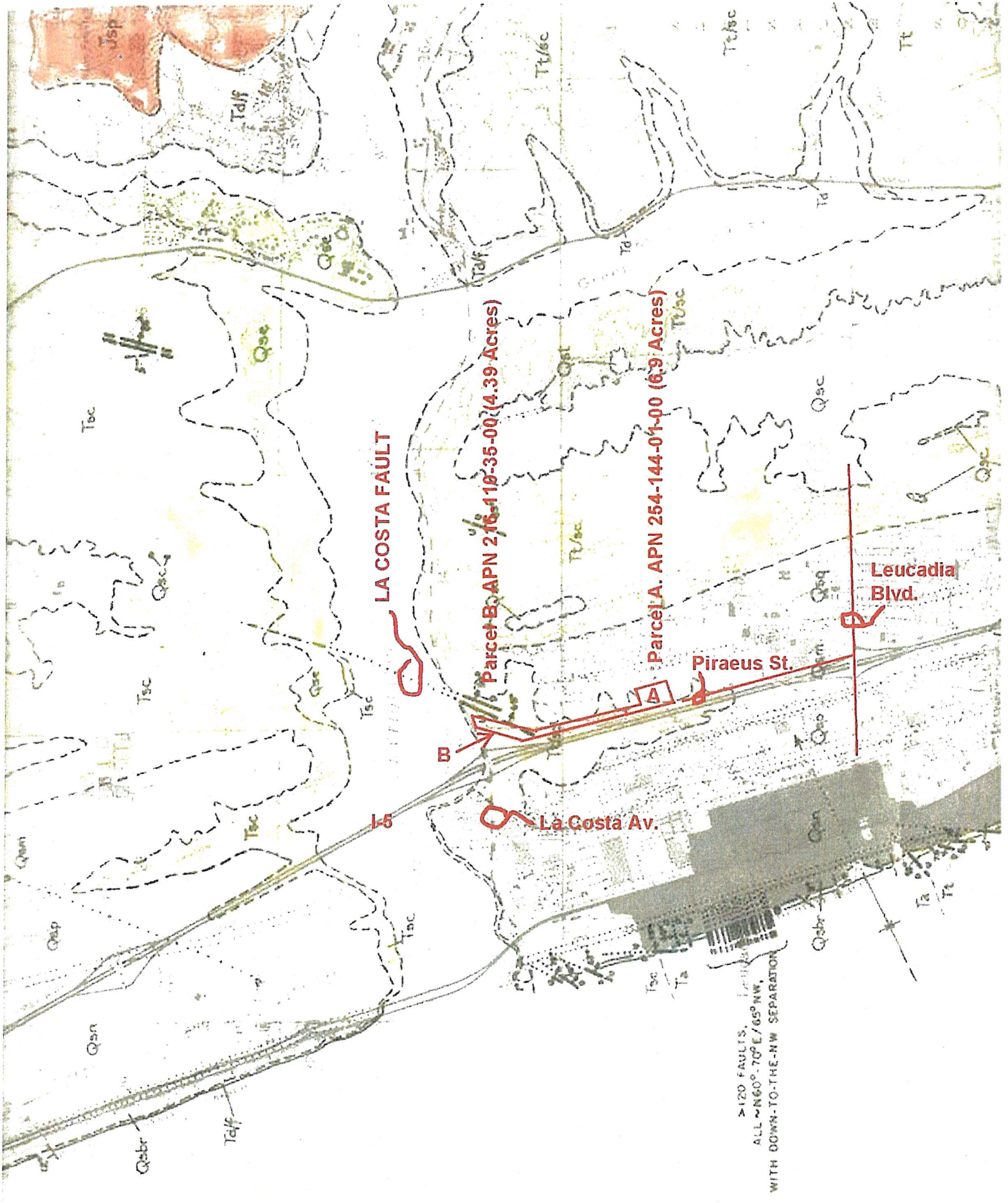
Appendices E

1) City of Encinitas Housing Element, Appendix C Adequate Sites Analysis- 2013 - 2021, 9 pages, and 2) Inclusionary Housing Economic Analysis, Townhomes R-15. Spreadsheet Pages 88-90 of 420 Page Report. Date prepared 12-02-2019. 3) Map of Housing Element City Council Approved sites, 06-20-2019



ENCINITAS
COMMUNITY
COLLECTIVE

Appendices A



nitated)

nitated)

nitated)

>120 FAULTS, *La Costa*
 ALL ~N60°-70°E/65°NW,
 WITH DOWN-TO-THE-NW SEPARATION



Appendices B

File No: 843604
Location: San Diego County, CA

Legend

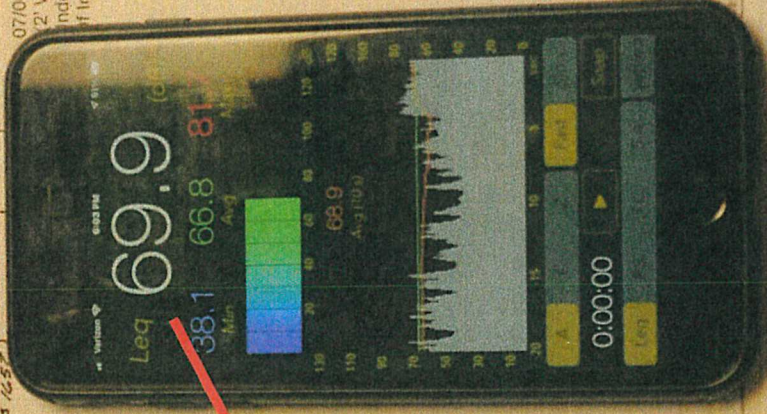
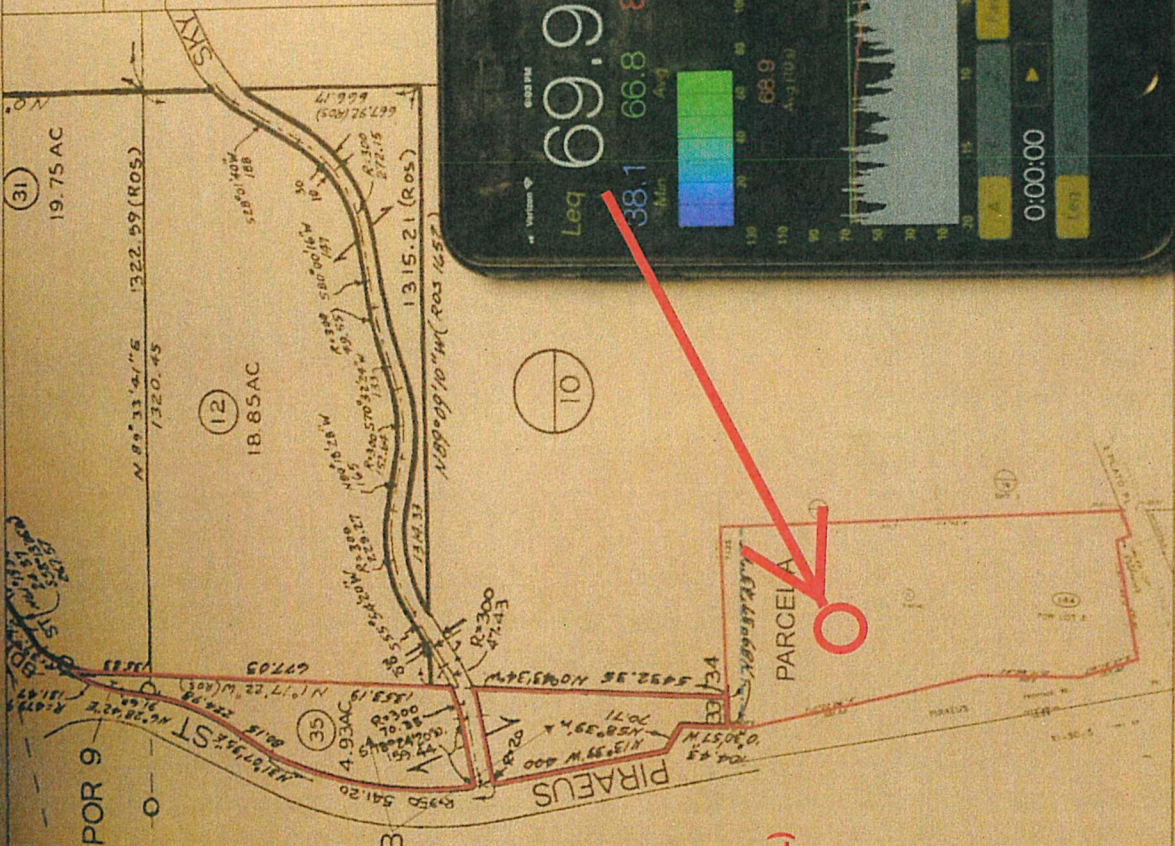
- PARCELA
- PARCEL B

10/25/1940 Bk3363 Pg154
(Either Or Both Pole Lines,
Underground Conduits, With
The Right Of Ingress And Egress
- Not Plottable)

07/06/1926 Bk1220 Pg410

2' Wide - Either Or Both Pole Lines,
Underground Conduits, With The Right
Of Ingress And Egress)

This map only is not a warranty, representation or
guarantee of the accuracy of the information shown on this map. It is
intended to provide a general overview of the property. The user is solely
responsible for obtaining the necessary information to make any decisions
regarding the property. The user is advised to consult with a professional
surveyor or other qualified person for more detailed information.
The user is advised to consult with a professional surveyor or other
qualified person for more detailed information.



**SOUND PRESSURE LEVEL (SPL)
MEASUREMENT**

**69.9 dBA SUNDAY JANUARY
10TH, 2022. TIME: 3:00 PM.**

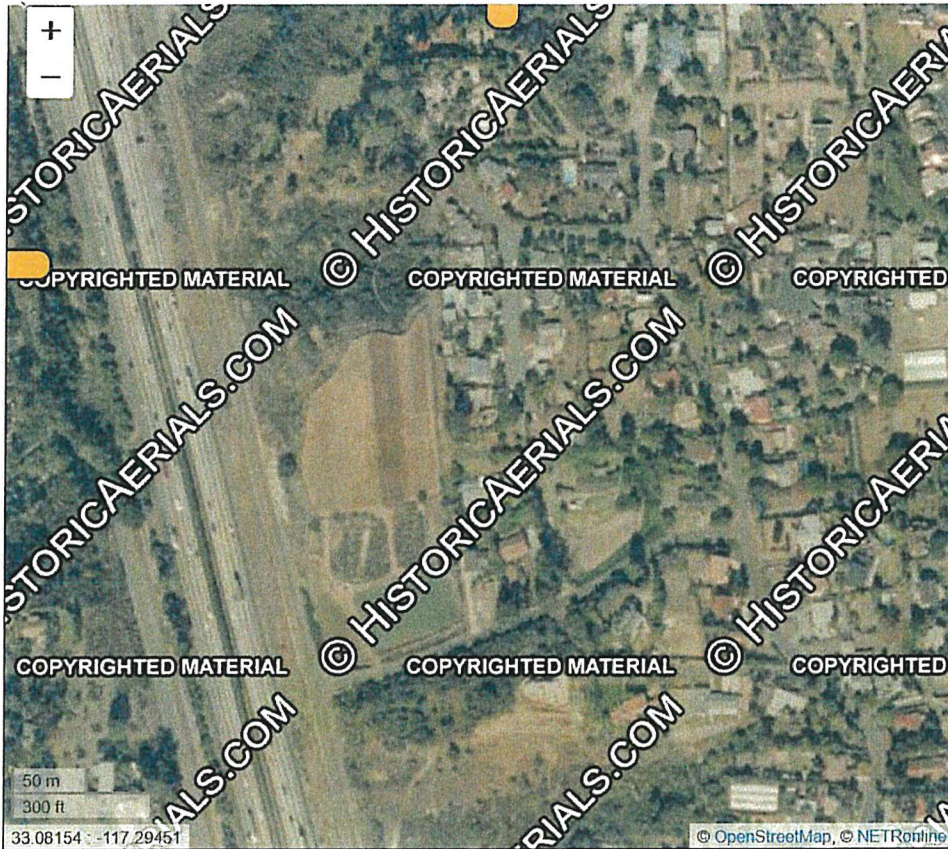
AVERAGE SPL 66.8 dBA

PEAK SPL 81.7 dBA



Appendices C

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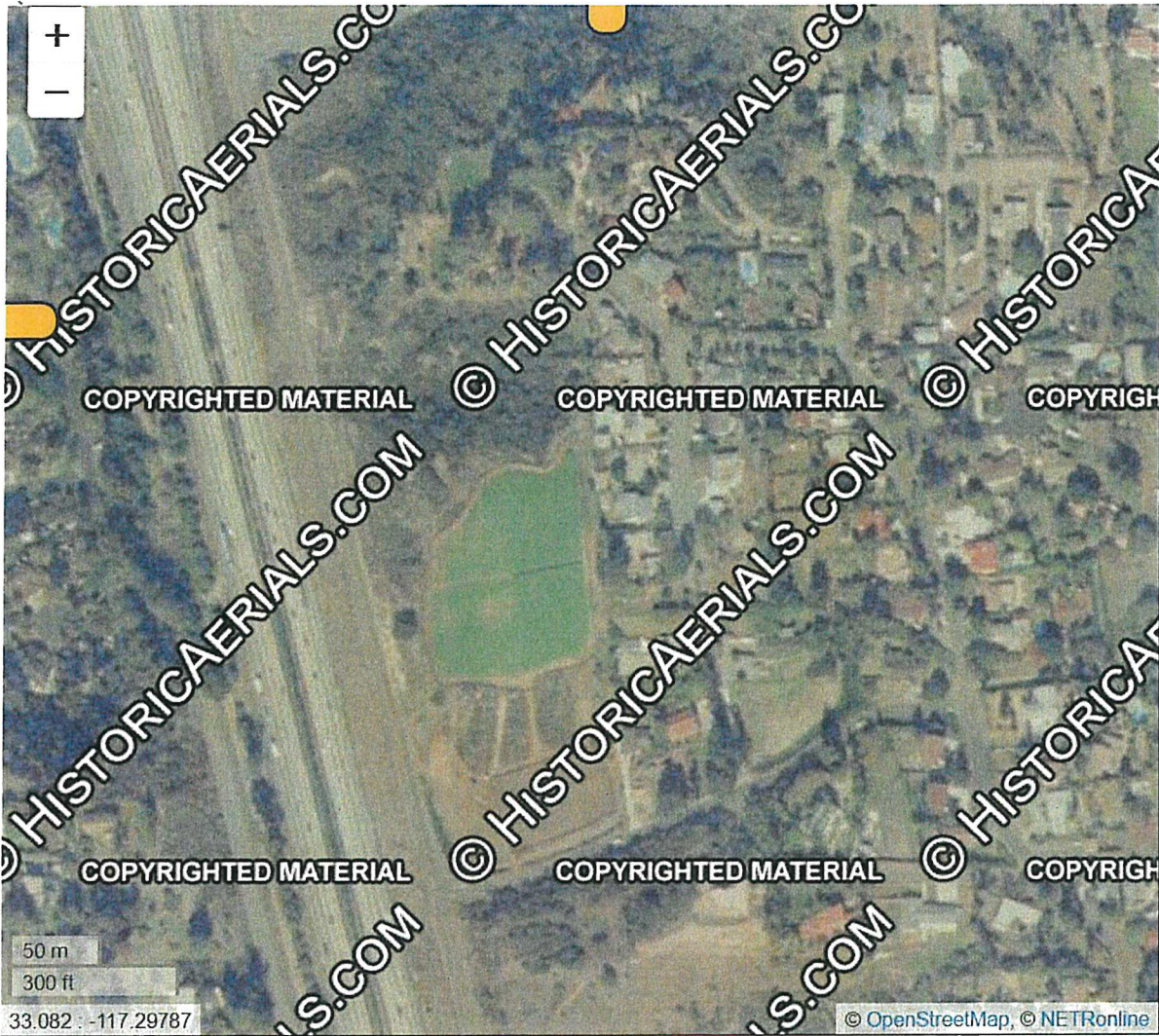


1999

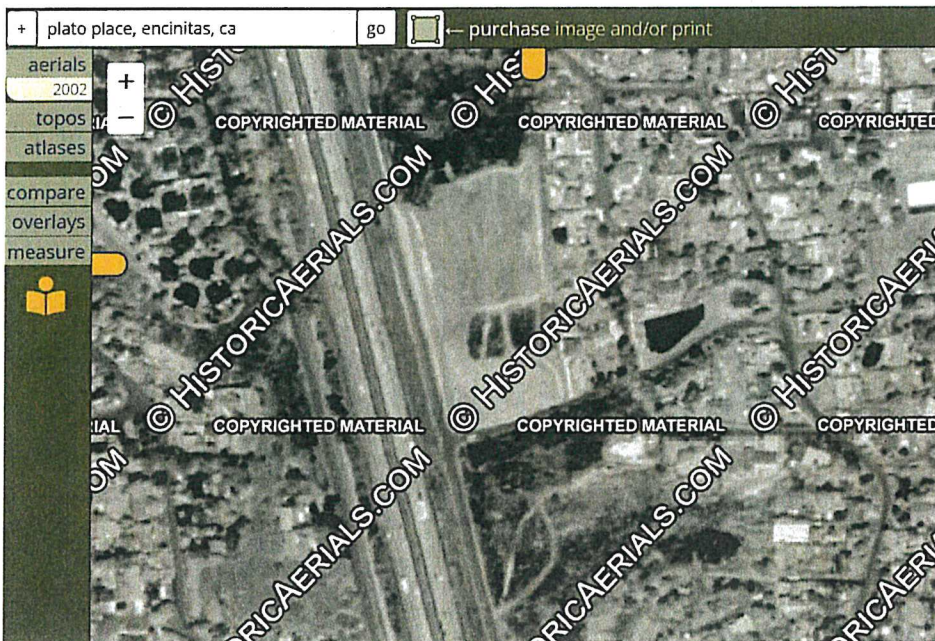
+ plato place, encinitas, ca go ← purchase image and/or print

aerials	2018
1999	2016
topos	2014
atlases	2012
	2010
compare	2009
overlays	2005
measure	2003
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	1989

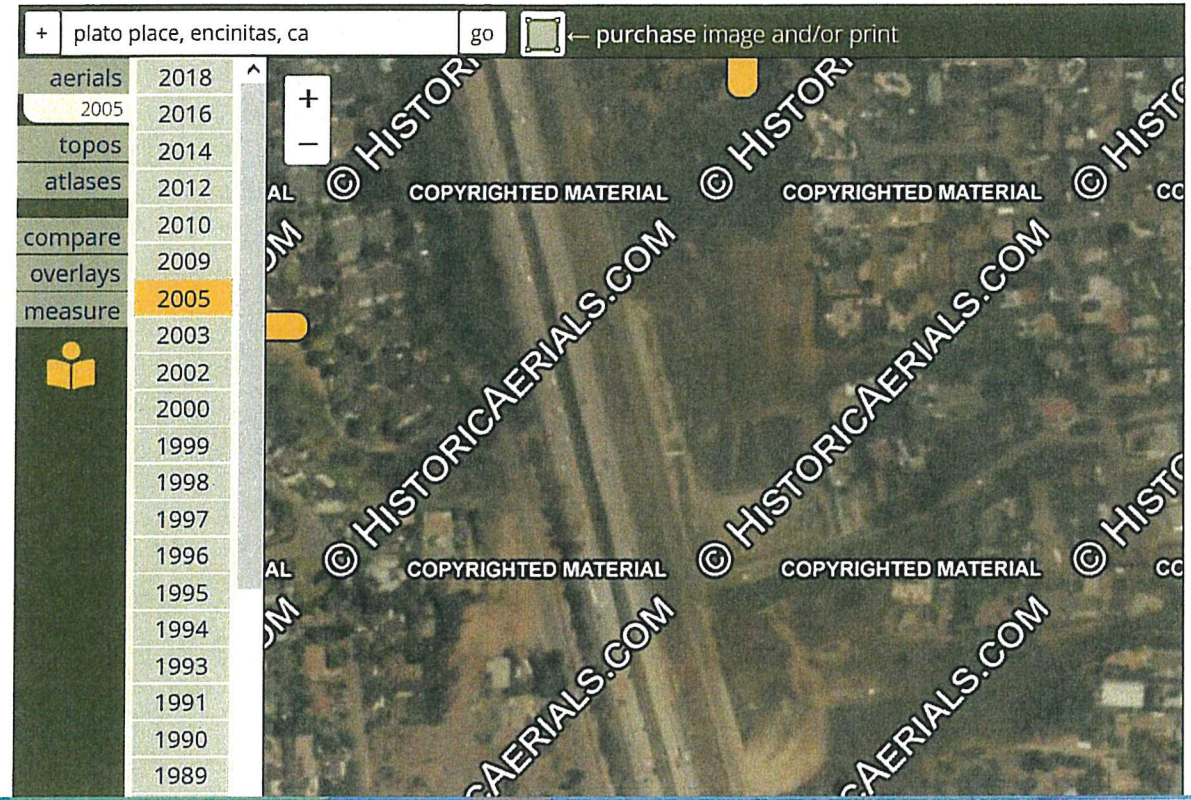
1999 Zoomed out



2002



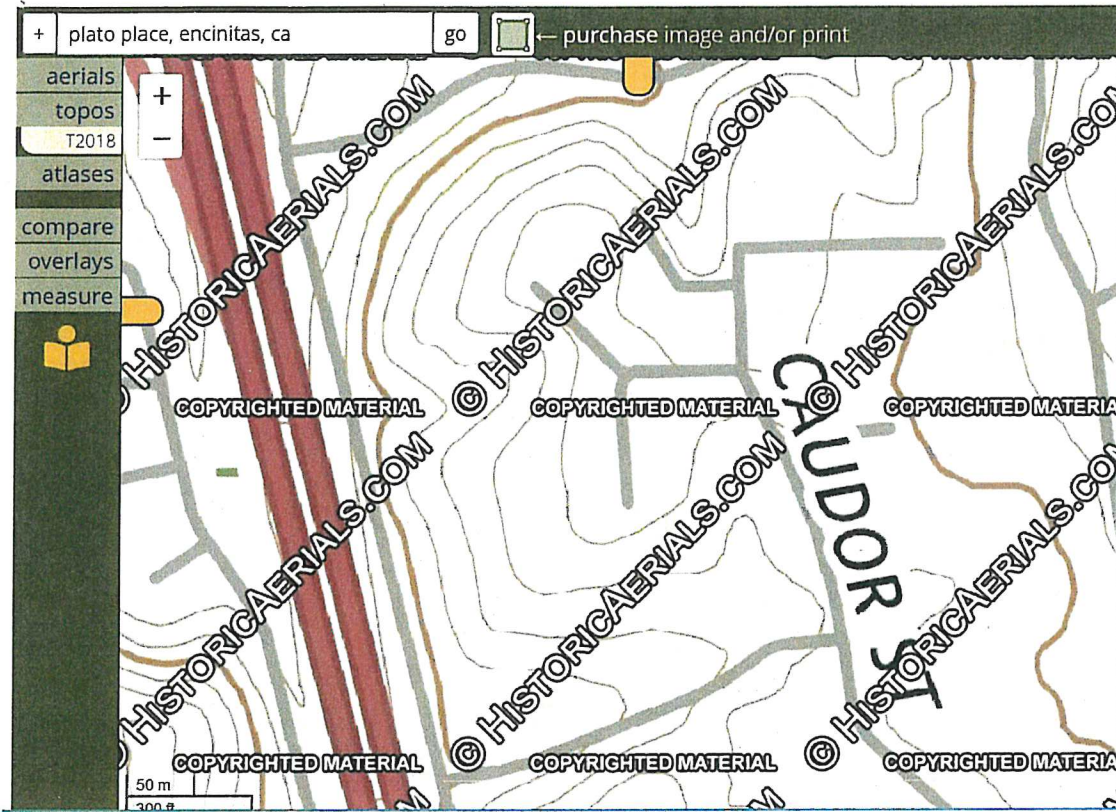
2005



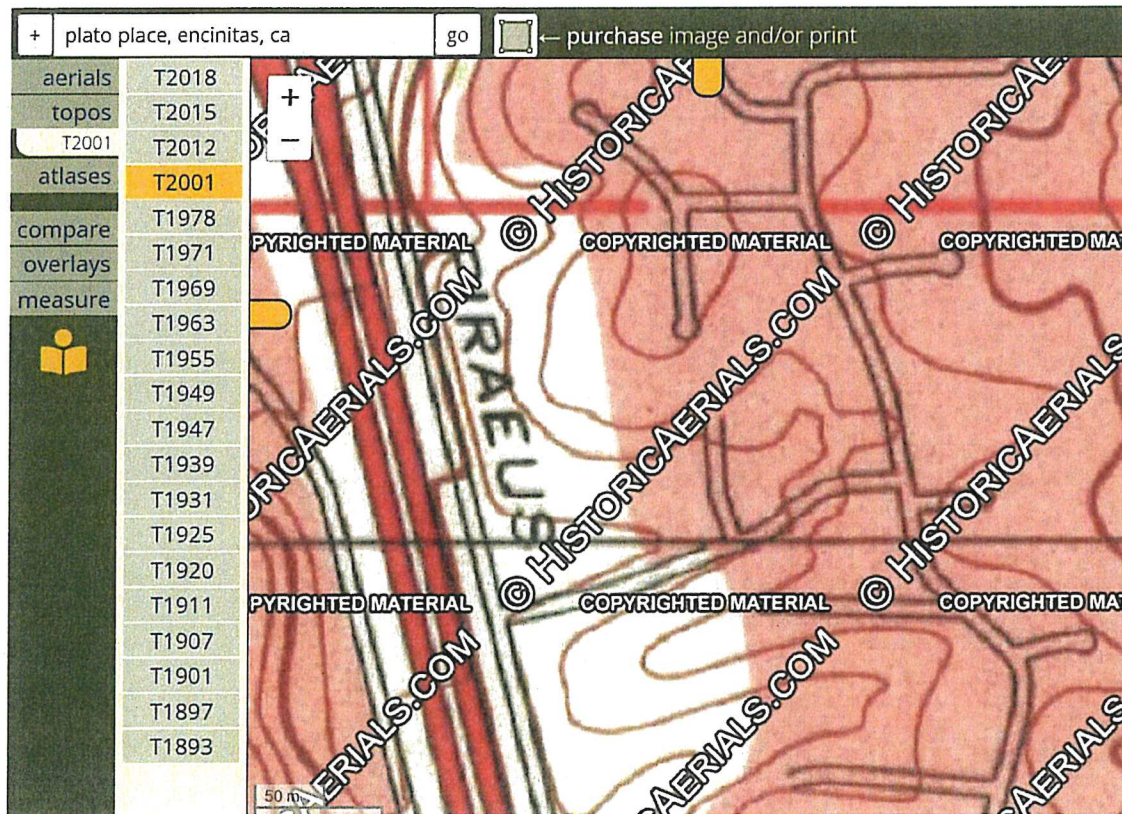
1964



TOPO Map 2018



TOPO Map 2001



TOPO Map 1978

+ plato place, encinitas, ca go ← purchase image and/or print

aerials	T2018
topos	T2015
T1978	T2012
atlases	T2001
compare	T1978
overlays	T1971
measure	T1969
	T1963
	T1955
	T1949
	T1947
	T1939
	T1931
	T1925
	T1920
	T1911
	T1907
	T1901
	T1897
	T1893

50 m
300 ft



Appendices D

DRAFT

**North Coast Corridor Public Works Plan/Transportation and
Resource Enhancement Program
Mitigation Site Assessment for the La Costa Preservation
Parcel**

Prepared by:

DUDEK

Prepared for:



AUGUST 2012

Printed on 30% post-consumer recycled material.

North Coast Corridor Mitigation Site Assessment for the La Costa Preservation Parcel

Site Location: The La Costa preservation parcel is located east of Interstate 5 (I-5), south of La Costa Avenue and east of Piraeus Street (see Figure 1). The parcel is situated across La Costa Avenue from Batiquitos Lagoon.

Latitude/Longitude: 33.0878/-117.2896

APN: 216-110-31 (19.75 acres)

Ownership: Caltrans has purchased this parcel

Correspondence with Resource Agencies: June 2008, Resource agencies receive request from Caltrans and SANDAG to approve site for acquisition; Letters acknowledging consideration of site for mitigation received from CCC March 2009, CDFG July 2008, USFWS August 2008, and NMFS July 2008.

MITIGATION GOAL

The San Diego Association of Governments (SANDAG) and California Department of Transportation (Caltrans) propose to mitigate impacts to sensitive upland habitats associated with the North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP) of multi modal transportation projects by preserving and managing existing high quality uplands habitat on the La Costa preservation parcel located along the south shore of Batiquitos Lagoon (see Figure 2). The goal of the preservation acquisition and mitigation program is to remove development potential of the parcel, enhance disturbed Coastal Sage Scrub (CSS) areas through rehabilitation efforts, preserve existing high quality upland habitat through site protection (easements and fence), and manage the parcel in perpetuity.

The proposed preservation and management of the native uplands vegetation communities will preserve:

- Occupied California gnatcatcher habitat by removing extant habitat from the threat of development;
- Chaparral and coastal sage scrub habitat and ecosystem continuity through connectivity between coastal wetlands and native uplands;
- Sensitive plants and cultural resources onsite;
- Wildlife connectivity with Batiquitos Lagoon and surrounding native open space that connects to Encinitas Creek and other drainages into the lagoon and out to the Pacific coastline; and,
- Natural topography adjacent to Batiquitos Lagoon that is highly visible from the I-5 corridor and significantly contributes to scenic quality and landscape character.

The proposed rehabilitation of the disturbed CSS communities will involve:

North Coast Corridor Mitigation Site Assessment for the La Costa Preservation Parcel

- The removal of nonnative species from areas mapped as disturbed CSS
- Replanting and/or hydroseeding disturbed areas with appropriate native species.

EXISTING CONDITIONS

Ecological Context

The parcel was identified as consisting of high to very high habitat values in the Multiple Habitat Conservation Plan (MHCP) for coastal northern San Diego County, and is located within a Biological Core Linkage area. The preservation area abuts the Carlsbad HCP core area #8 that comprises Batiquitos Lagoon. The lagoon is owned and managed by the California Department of Fish and Game. California Natural Diversity Database (CNDDDB) mapped resources for these adjacent uplands to Batiquitos Lagoon includes a variety of nearby data points (Figure 3). Special status plant species identified onsite include California adolphia (*Adolphia californica*) and wart stemmed ceanothus (*Ceanothus verrucosus*), while sea dahlia (*Coreopsis maritima*) and Del Mar sand aster (*Lessingia filaginifolia* var. *linifolia*) have been identified nearby (Figure 4). Numerous special status wildlife species are also identified within and adjacent to Batiquitos Lagoon (Figure 5), and critical habitat for the California gnatcatcher is designated on the entirety of the parcel. Adjacent upland areas, including the subject parcels, are utilized by California gnatcatcher.

Other open space lands are present south and east of the preservation parcel. These open space areas are located on slopes and canyons that topographically form the southern boundary of Batiquitos Lagoon. These slopes provide linkages to inland areas associated with Encinitas Creek and other drainages that flow into the lagoon and ultimately connect to the Pacific.

Soils

The acquired parcel consists of steep north and northwest facing slopes. Three soil types are present on the parcel including Carlsbad gravelly loamy sand at the base of the slope, Gaviota fine sandy loam on the steepest slopes, and Corralitos loamy sand on the mesa top (NRCS, Web Soil Survey).

Vegetation

Diegan coastal sage scrub, chaparral (both southern maritime chaparral and chamise chaparral), and disturbed habitat communities were identified on the parcel. The parcel has good habitat with excellent habitat found on the top of the mesa. It provides habitat for sensitive plants as well as the threatened California gnatcatcher and supports rare plants and communities. There is little

North Coast Corridor Mitigation Site Assessment for the La Costa Preservation Parcel

weed invasion in most places, and minimal effort would be needed to fence these parcel to control access and preserve the habitat in place.

A general description of each community and a description of its occurrence within the parcel are provided below.

Diegan Coastal Sage Scrub. This vegetation type was once widespread in coastal southern California, and now it occurs in patches from Los Angeles into Baja California. This plant community on the parcel totals about 11.75 acres and is composed of a variety of low, soft aromatic shrubs dominated by drought-deciduous species such as California sagebrush (*Artemisia californica*), flat-topped buckwheat (*Eriogonum fasciculatum* var. *fasciculatum*), white sage (*Salvia apiana*), and black sage (*Salvia mellifera*). Coastal sage scrub (CSS) on site is dominated by California sagebrush and buckwheat with prickly pear (*Opuntia littoralis*), laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), black sage, desert elderberry (*Sambucus mexicana*), California sunflower (*Encelia californica*), and golden yarrow (*Eriophyllum confertifolium* var. *confertifolium*) (Figure 2). California adolphia (*Adolphia californica*), a sensitive plant, occurs in this community on site. The top of the mesa is relatively densely vegetated except along walking trails. The top of the slope on the northern end of the mesa has patches that are more disturbed with nonnative grasses and weedy annuals including ripgut grass (*Bromus diandrus*), foxtail chess (*Bromus madritensis* var. *rubens*), mustard (*Brassica* sp.), and ice plant (*Carpobrotus edulis*).

The base of the canyon on the northeastern end of the parcel consists of approximately 3.65 acres of disturbed coastal sage scrub dominated by coyote bush (*Baccharis pilularis*), California sunflower, and black sage with large patches of fennel (*Foeniculum vulgare*).

Chaparral. Two types of chaparral are found on site including chamise chaparral and southern maritime chaparral. There is approximately 3.38 acres of chaparral on site. Chamise chaparral is dominated by chamise (*Adenostoma fasciculatum*) in dense almost monotypic stands. This is a fire-adapted community that is found primarily on east-facing slopes. Chamise chaparral on site occurs in small patches on north-facing slopes of the parcel.

Southern maritime chaparral occurs on the upper north-facing slopes at the western end of the parcel and on the north facing slopes of the canyon. This community is dominated by wart-stemmed ceanothus (*Ceanothus verrucosus*) with chamise, toyon (*Heteromeles arbutifolia*), laurel sumac, fuchsia-flowered gooseberry (*Ribes speciosum*), mission manzanita (*Xylococcus bicolor*), and Mohave yucca (*Yucca schidigera*). Elements of Diegan coastal sage scrub are interspersed within this community.

North Coast Corridor Mitigation Site Assessment for the La Costa Preservation Parcel

A summary of existing habitat types and acreage on the La Costa parcel is provided in Table 1, below.

**Table 1
Preservation Acreage by Habitat Type**

Preserved Habitat Type	Mitigation Acreage
Coastal Sage Scrub	11.75 ac.
Disturbed Coastal Sage Scrub	3.65 ac.
Chaparral	3.38 ac.
Disturbed Habitat (Coastal Sage Scrub Enhancement)	0.97 ac.
Total	19.75 ac.

Wildlife

One pair of threatened coastal California gnatcatcher (*Polioptila californica californica*) was observed at the top of the parcel (see Figures 2 and 5). Other bird species that were observed on site include California towhee (*Pipilo crissalis*), song sparrow (*Melospiza melodia*), Anna's hummingbird (*Calypte anna*), bushtit (*Psaltriparus minimus*), and California thrasher (*Toxostoma redivivum*). Other wildlife species observed on site include coyote (*Canis latrans*), western fence lizard (*Sceloporus occidentalis*), desert cottontail (*Sylvilagus audubonii*), and California ground squirrel (*Spermophilus beecheyi*).

Prior and Current Land Use

The parcel is adjacent to La Costa Avenue on the north. Piraeus Street is located to the west and Sky Loft Road to the south. La Costa Avenue is a four-lane road with high traffic speeds and no roadside parking. Access from La Costa Avenue is extremely limited and roadside parking is dangerous. Limited parking is available on the shoulder of Piraeus Street adjacent to the south at the intersection with La Costa Avenue. Roadside parking along Sky Loft Road is limited by an asphalt curb that runs the length of this road up to the existing residential development.

Some informal hiking trails are present on the parcel. These trails appear to be used to access high points that provide vistas of Batiquitos Lagoon and the Pacific Ocean. Due to the lack of parking, these trails are likely used only by local residents.

Existing Utilities/Infrastructure/Easements

There are no known utilities, infrastructure, or easements located on the parcel that could affect implementation of the proposed mitigation/preservation opportunity (see Figure 6).

North Coast Corridor Mitigation Site Assessment for the La Costa Preservation Parcel

MITIGATION PROGRAM

The proposed mitigation for the entirety of the site will be for protected open space, habitat preservation and management. The goal of the preservation acquisition is to remove development potential of the parcel, preserve existing upland habitat through site protection (easements and fence), and ensure management in perpetuity.

Rehabilitation

Areas that are mapped as disturbed CSS will be rehabilitated through the removal of nonnative species and the replanting and/or seeding with an appropriate native CSS plant palette.

Target Plant Communities

The design and plant palette used to rehabilitate the disturbed CSS areas will include native species found in adjacent native areas. To provide appropriate native species diversity that is comparable to adjacent high quality habitat, additional field surveys of the La Costa Parcel, detailing annual and perennial species will need to occur and the recorded species added to the plant palette in the NOID submittal, as appropriate.

SITE PROTECTION

Caltrans will deed the preservation parcel to a local land management agency that is acceptable to the resource agencies. A management endowment account will be established once the property acquisition is complete. The endowment funds will be used by the management entity to monitor and maintain site access restrictions and habitat quality.

Site restrictions might be required to fully protect existing biological resources. However, some controlled access opportunity for local residents to access vistas should be considered to minimize vandalism on the preserved land. Any fence installed will be maintained as part of the preserved land management.

LONG TERM MANAGEMENT

A Habitat Management Plan (HMP) will be prepared to define the long term management responsibilities to maintain the functions and services of the preserved biological resources. A resource agency-approved management entity will assume long term management responsibilities. Funds for long term management will be provided by SANDAG/Caltrans and placed into a non-wasting endowment. Endowment funds will be established using a Property Assessment Report that is based on the approved HMP.

North Coast Corridor
Mitigation Site Assessment for the La Costa Preservation Parcel

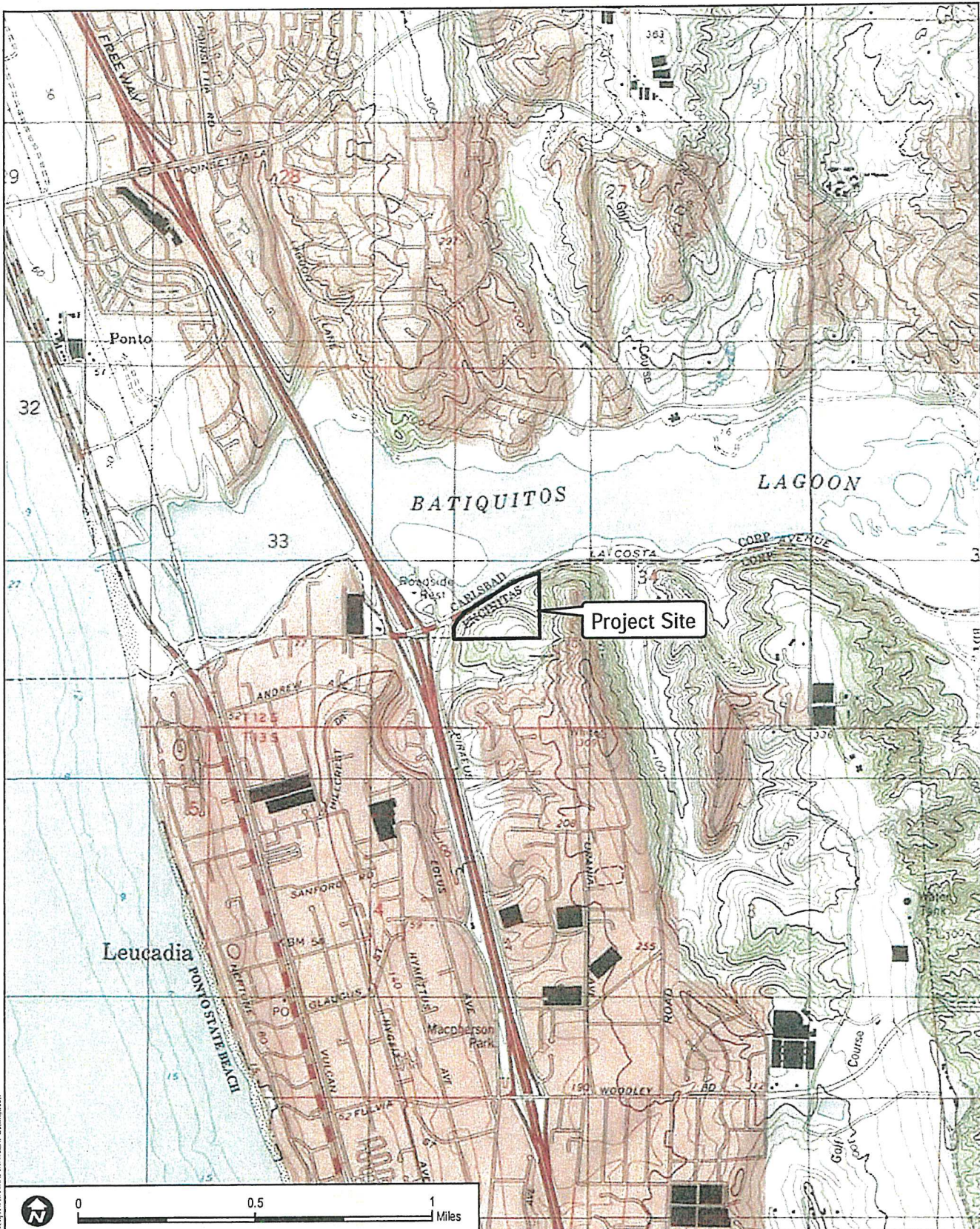
Anticipated potential management issues related to this parcel include site access control, weed control, trash accumulation control.

ADDITIONAL STUDIES

Rehabilitation of disturbed CSS areas may occur as a portion of the proposed mitigation program for the La Costa Parcel. Additional field surveys of the La Costa Parcel will need to occur to determine appropriate plant palettes to be used in the rehabilitation efforts onsite.

REQUIRED PERMITS

No permits are anticipated to be required to implement site protection and management actions.



\NOTICE: DATA IN THIS MAP IS UNOFFICIAL AND NOT FOR CONSTRUCTION PURPOSES.

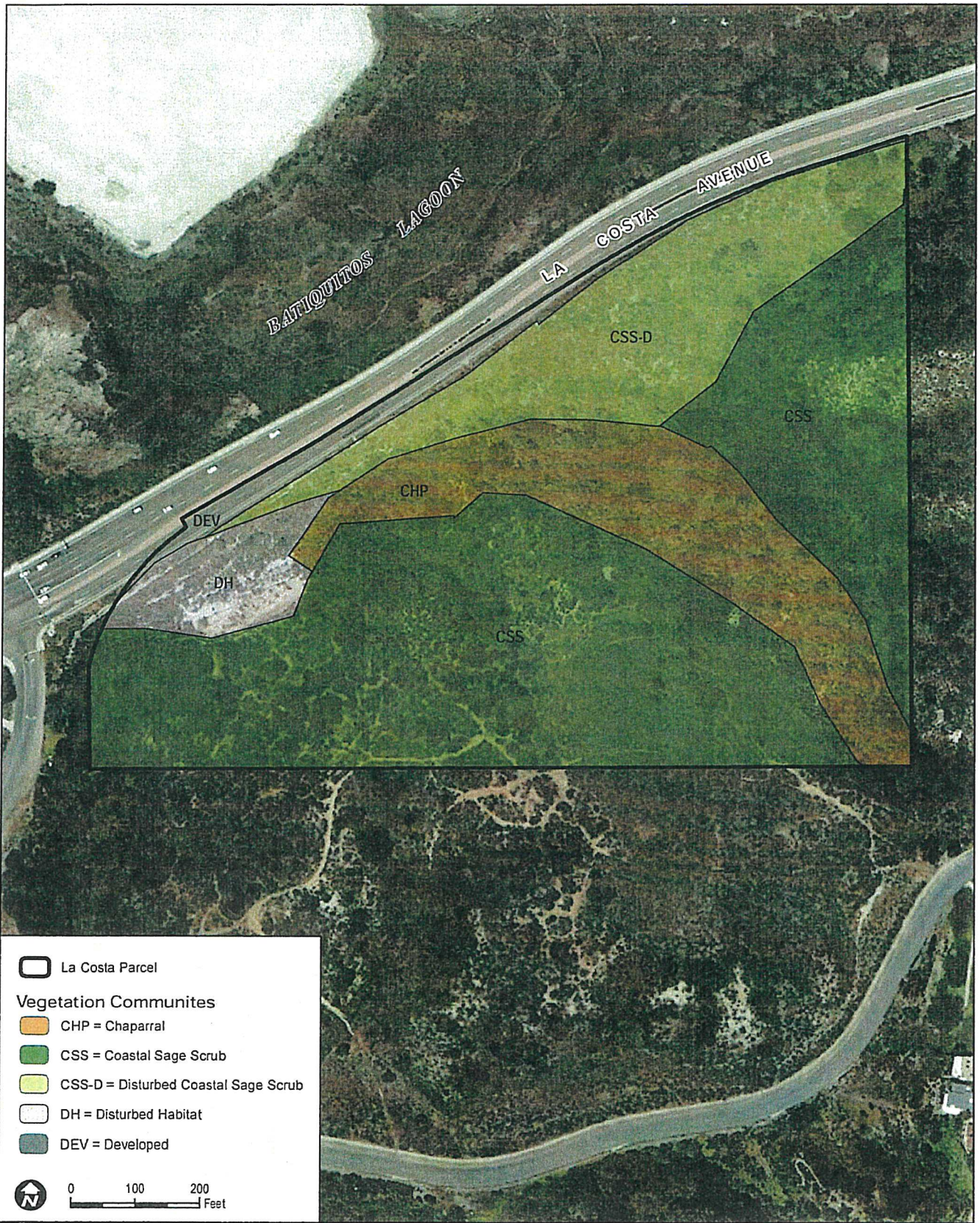
DUDEK

6264-06
NOVEMBER 2011

SOURCE: USGS Topo 7.5 Minute Series - Encinitas Quadrangle


La Costa Preservation Parcel

FIGURE 1
Project Vicinity



 La Costa Parcel


Vegetation Communities

 CHP = Chaparral

 CSS = Coastal Sage Scrub

 CSS-D = Disturbed Coastal Sage Scrub

 DH = Disturbed Habitat

 DEV = Developed



0 100 200 Feet

DUDEK

VEGETATION SOURCE: Caltrans 2011
AERIAL SOURCE: DigitalGlobe 2008

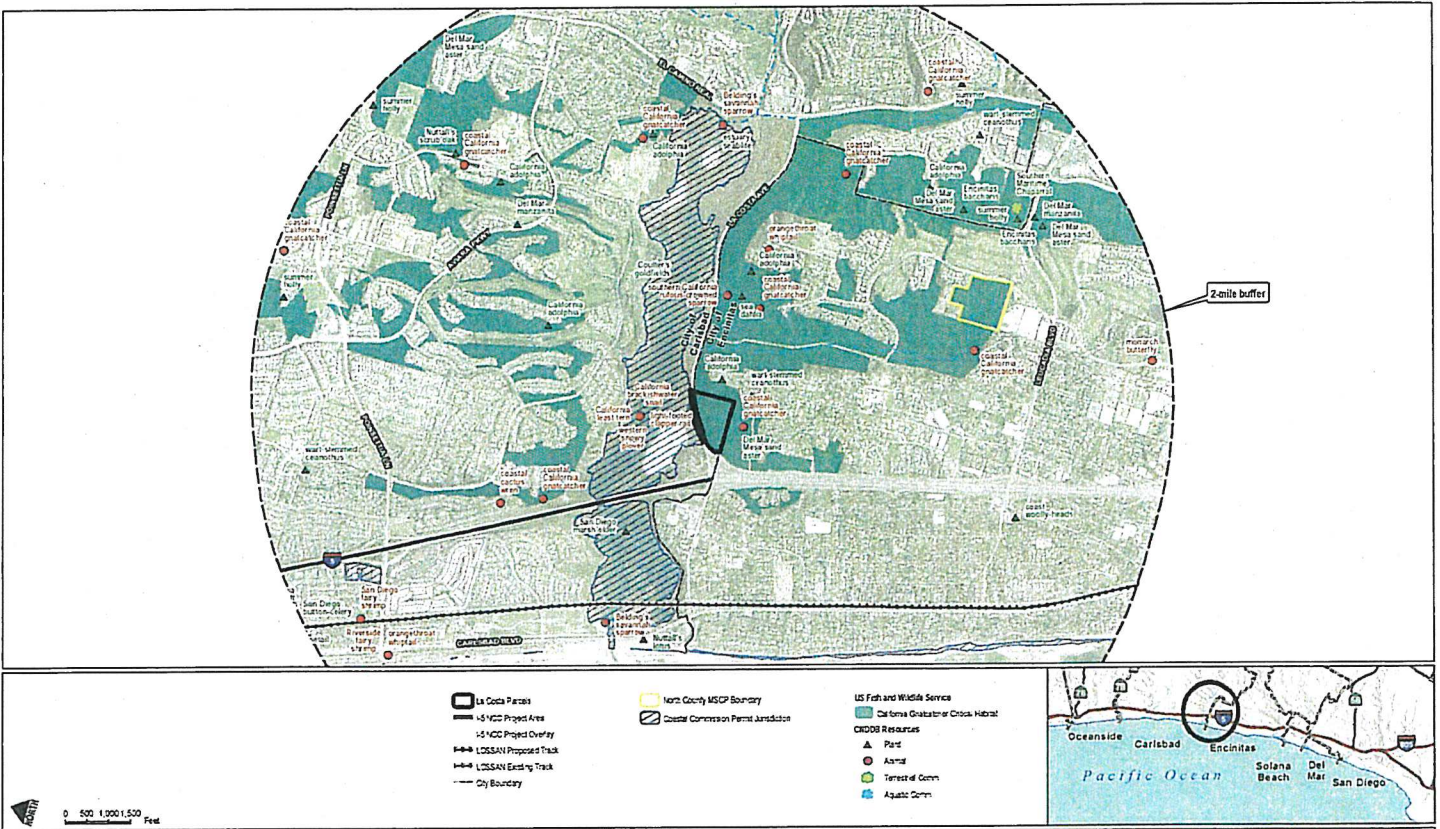
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NOVEMBER 2011

La Costa Preservation Parcel

FIGURE 2
Existing Vegetation

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DATA SOURCES: Caltrans, California Coastal Commission, Local Jurisdictions, SanGIS, SANDAG, CDPS, USFWS, Imagery: Digital Globe March 2008

DRAFT

FIGURE 3
La Costa Parcels CNDDB Resources within 2 miles

North Coast Corridor Transportation and Resource Enhancement Program and Highway Public Works Plan



Legend MS NCC Project Area MS NCC Project Overlay City boundary Natural Sensitivity HI side and island BLT Overlay Zone Wetland Study Overlay Zone Slopes 25% or Greater Coastal Commission Permit Jurisdiction	Encinitas LDP Designated ESA Natural Sensitivity HI side and island BLT Overlay Zone Wetland Study Overlay Zone Slopes 25% or Greater Coastal Commission Permit Jurisdiction	Special Status Vegetation LUPIN Vegetation CBS + Coastal Bush Scrub CBS + Coastal Sage Scrub CBS + Coastal Sage Scrub (Disturbed) NMS + Non-native Grassland SMC + Southern Maritime Chaparral SMC + Southern Maritime Chaparral (Disturbed)	Special Status Vegetation Wetland Vegetation CSM + Coastal Brackish Marsh (Disturbed) CSM + Coastal Brackish Marsh (Disturbed) DD + Dune/ridge Ditch (Disturbed) FWM + Freshwater Marsh (Disturbed) FWM + Freshwater Marsh (Disturbed) MF + Mud Flat MFS + Mide Flat Scrub OWS + Open Water SMT + Salt Marsh Transition	Special Status Vegetation Wetland Vegetation SAWW + Southern Arroyo Willow Woodland (Disturbed) SAWW + Southern Arroyo Willow Woodland (Disturbed) SM + Southern Coastal Salt Marsh (Disturbed) SM + Southern Coastal Salt Marsh (Disturbed) SWS + Southern Willow Scrub (Disturbed) SWS + Southern Willow Scrub (Disturbed)	Special Status Plants Plants AC = Adiantum californicum CM = Coast barnet cactus DM = Del Mar desert oak NSO = Nutsall's scrub oak OP = Orange poplar SA = San Diego sand aster SCS = South coast salsola SD = Sea dahlia TS = Toyon pine WC = West-desert cactaceae	Special Status Plants Plants California adonis Coast barnet cactus Del Mar manzanita Del Mar sand aster Nutsall's scrub oak Orange poplar Sea dahlia South coast salsola Toyon pine West-desert cactaceae Other CM = Del Mar sand aster DM = San Diego sand aster	
--	--	--	--	--	--	--	--

DATA SOURCES: Caltrans, California Coastal Commission, Local Jurisdiction, SANDAG, SANDAG, CDFG, Imagery, Digital State Map 2200

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FIGURE 4
La Costa Parcels Special Status Plant Resources
 North Coast Corridor Transportation and Resource Enhancement Program and Highway Public Works Plan

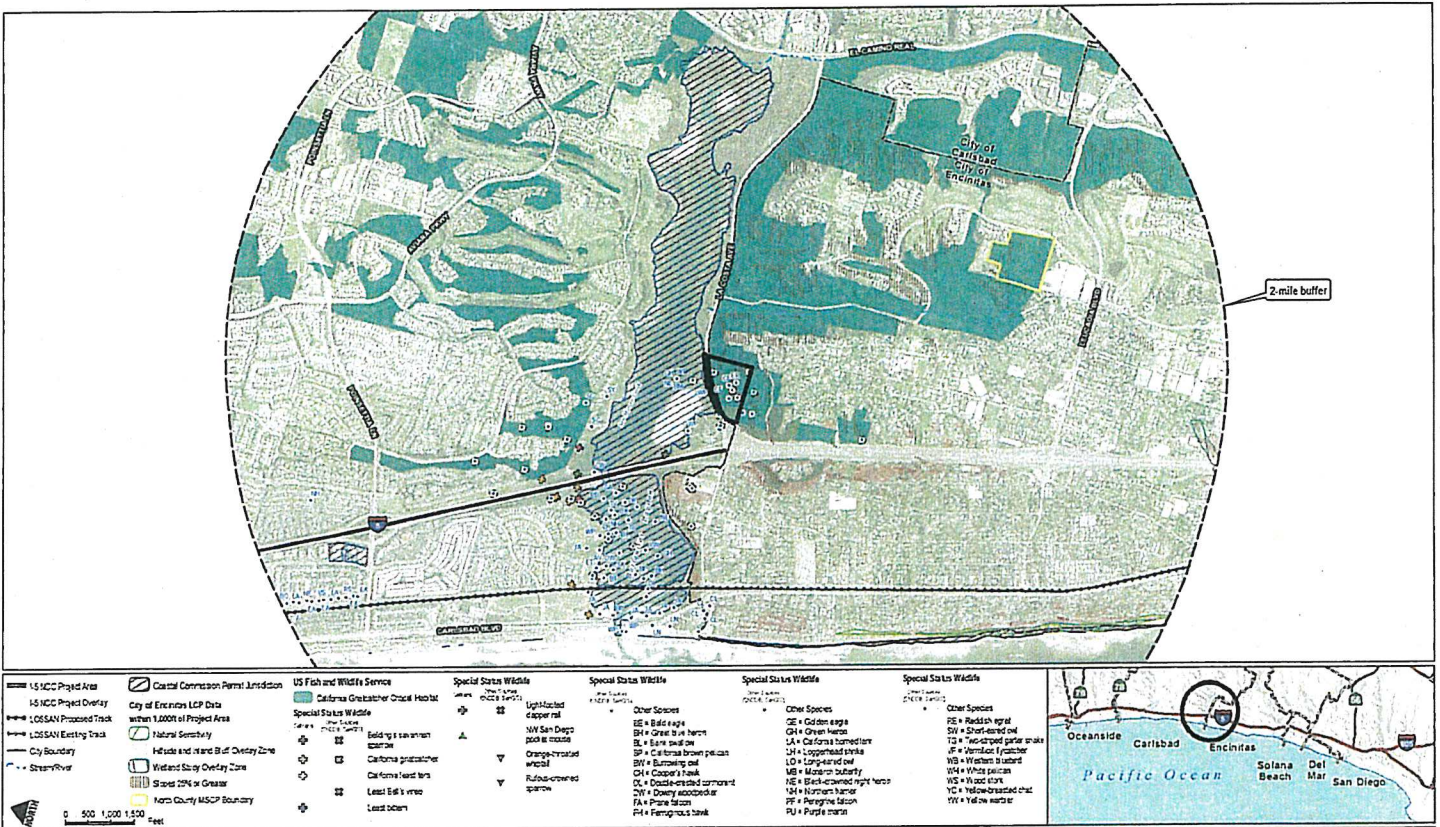
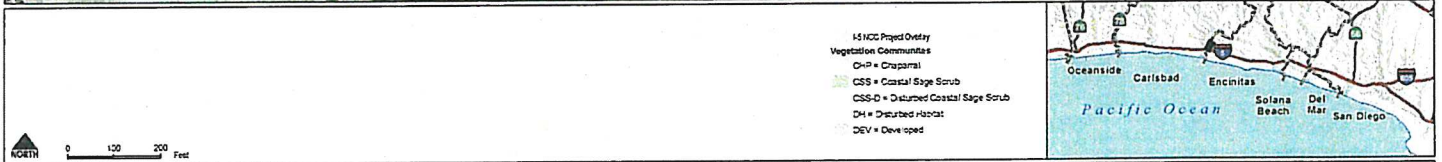
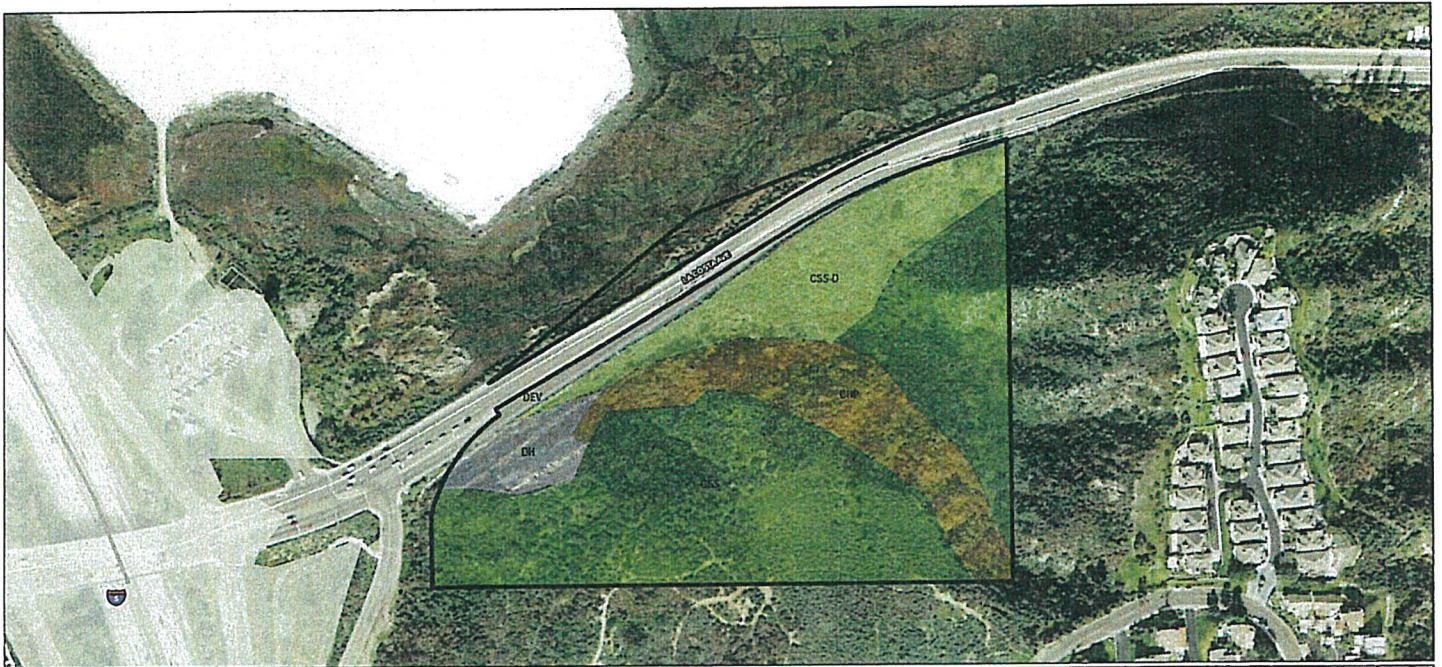


FIGURE 5
La Costa Parcel Special Status Wildlife Resources
 North Coast Corridor Transportation and Resource Enhancement Program and Highway Public Works Plan

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DATA SOURCES: Caltrans, California Coastal Commission, Local Jurisdictions, SeGIS, SANDAG, CDPG, USFWS, Imagery, DigitalGlobe March 2008



DATA SOURCES: Caltrans, California Coastal Commission, Local Jurisdictions, SanGIS SANDEG, CIP2, LSP15, Imagery Digital Globe March 2009

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FIGURE 6
La Costa Parcels Constraints Map

North Coast Corridor Transportation and Resource Enhancement Program and Highway Public Works Plan



Appendices E-1



Appendix C: Adequate Sites Analysis

Appendix C contains the site inventory and analysis for the sites proposed to meet the City of Encinitas' Regional Housing Needs Assessment (RHNA) allocation for the 2013-2021 planning period. The sites are organized to show how the City can meet the need for the four RHNA income categories (Very Low, Low, Moderate, and Above Moderate). That information is summarized in **Table C-1** below.

Table C-1: Adequacy of Sites Inventory					
	Extremely Low/Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA (2013-2021)	587	446	413	907	2,353
RHNA Carryover (2003-2013)	253		--	--	253
Units Built/Approved	33	33	4	892	962
Accessory Unit Production	79		54	--	133
Remaining RHNA	1,141		355	15	1,511
Candidate Site Unit Yield	1,504		523	177	2,204
Total Capacity Over RHNA Need	363		168	162	693

All sites were reviewed in order to ensure compliance with state law. The sites chosen meet that criteria and show the highest potential to redevelop for residential use within the planning period.

1.1 Availability of Water, Sewer, and Dry Utilities

The City of Encinitas has evaluated the availability of infrastructure from a Citywide and site-specific standpoint. In determining the feasibility of sites to accommodate the City's RHNA needs, infrastructure provision was a determining factor. As described in Appendix B under 'Environmental Constraints and Infrastructure,' the City has adequate water and sewer capacity to accommodate the planned increase in housing development. The City has reviewed the sites designated for development and has determined that each of the sites designated within each income category is adjacent to a public street that contains distribution facilities for water, sewer, and dry utilities (including cable and telephone). The availability and location of water, sewer and dry utilities and their distribution facilities do not pose a constraint to development.



C.1 Very Low and Low-Income Candidate Sites Inventory

SITES INVENTORY LIST

Very Low/Low Income RHNA Candidate Sites

Vacant

SITE 02: CANNON PROPERTY (PIRAEUS)

SITE 05: ENCINITAS BLVD & QUAIL GARDENS SITES

SITE 06a: ARMSTRONG PARCELS

SITE 08a: RANCHO SANTA FE PARCELS (GAFFNEY/GOODSEN)

SITE AD1: SAGE CANYON

SITE AD2a: BALDWIN & SONS PROPERTIES

SITE AD2B: BALDWIN & SONS PROPERTIES

Non-vacant

SITE 01: GREEK CHURCH PARCEL

SITE 06b: ARMSTRONG PARCELS

SITE 07: JACKEL PROPERTIES

SITE 08b: RANCHO SANTA FE PARCELS (GAFFNEY/GOODSEN)

SITE 09: ECHTER PROPERTY

SITE 12: SUNSHINE GARDENS PARCELS

SITE AD2c: BALDWIN & SONS PROPERTIES

SITE AD8: VULCAN & LA COSTA

SITE AD9: SEACOAST CHURCH

SITE AD11: MANCHESTER AVENUE WEST SITES

SITE AD14: HARRISON SITES

SITE AD31: MEYER PROPOSAL

Table C-2: Net Acreage and Unit Yield Per Site				
Site Number	Site Name	Gross Acreage	Net Acreage	Unit Yield (DU)
Vacant¹				
02	Cannon Property (Piraeus)	6.93	6.93	173
05	Encinitas Blvd & Quail Gardens Sites	4.91	4.78	119
06a	Armstrong Parcels	1.92	1.06	26
08a	Rancho Santa Fe Parcels (Gaffney/Goodsen)	1.75	1.45	36
AD1	Sage Canyon	5.23	2.40	60
AD2a	Baldwin & Sons Properties	3.14	2.98	74
AD2b	Baldwin & Sons Properties	6.66	4.86	121
Subtotal		30.54	24.46	609
Non-vacant				
01	Greek Church Parcel	2.50	2.00	50
06b	Armstrong Parcels	1.32	1.16	29
07	Jackel Properties	2.97	2.97	33 ²
08b	Rancho Santa Fe Parcels (Gaffney/Goodsen)	4.88	4.57	113
09	Echter Property	21.49	9.85	246
12	Sunshine Gardens Parcels	3.39	3.39	84
AD2c	Baldwin & Sons Properties	1.79	1.21	30
AD8	Vulcan & La Costa	2.00	2.00	50
AD9	Seacoast Church	4.45	1.41	35
AD11	Manchester Avenue West Sites	1.67	1.67	41
AD14	Harrison Sites	1.91	1.91	21 ²
AD31	Meyer Proposal	6.62	6.52	163
Subtotal		54.99	38.66	895
Total		85.53	63.12	1,504

Notes:

1. HCD has stated to the City that vacant parcels must be entirely unimproved and separately subdivided parcels, and Table 2-6 reflects this direction. However, the City believes that the following sites should also be considered to be vacant: Site 01 (50 units) consists entirely of unimproved land, but has not been subdivided from the improved part of the site. Site 07 (33 units) consists of unimproved land and an abandoned, vacant structure. Site AD2c (30 units) has utility lines on a portion of the site which have been deducted from net acreage, but the parcel is otherwise entirely unimproved, and the utility lines would not prevent an owner from developing the site for residential units. In the City's view, these sites should be considered vacant, adding 118 additional units to the Unit Yield on vacant property, for a sub-total of 727 units on vacant sites, far above 50% of the unmet RHNA need for the planning period.

2. Unit Yield anticipates that this site will be developed for mixed-use.

Table C-3: Percentage of VL/L Sites by Site Type		
Site Type	# of Units	% of Remaining Lower Income RHNA Allocation (1,141)
Vacant	609	53%
Non-vacant	895	78%
Total	1,504	132%
RHNA Allocation (including carryover) for VL/L Income Categories: 1,286		
Units Constructed and Estimated ADUs: 145		
Remaining RHNA Allocation for VL/L Income Categories: 1,141		

Table C-4: Net Acreage and Unit Yield on Residentially Zoned Sites				
Site Number	Site Name	Zoning Designation	Net Acreage	Unit Yield (DU)
Vacant				
02	Cannon Property (Piraeus)	RR2	6.93	173
08a	Rancho Santa Fe Sites (Gaffney/Goodsen)	RR2	1.45	36
AD1	Sage Canyon	R3	2.40	60
AD2a	Baldwin & Sons Properties	R3	2.98	74
AD2b	Baldwin & Sons Properties	R5	4.86	121
Subtotal			18.62	464
Non-vacant				
01	Greek Church Parcel	RR1	2.00	50
08b	Rancho Santa Fe Parcels (Gaffney/Goodsen)	RR2	4.57	113
AD2c	Baldwin & Sons Properties	R5	1.21	30
AD8	Vulcan & La Costa	R3 (N101SP)	2.00	50
AD9	Seacoast Church	R11	1.41	35
AD11	Manchester Avenue West Sites	R11	1.67	41
AD31	Meyer Proposal	R3/R5	6.52	163
Subtotal			19.38	482
Total			38.00	946

Notes:

1. Unit Yield anticipates that this site will be developed for mixed-use.

NET ACREAGE CALCULATIONS

Very Low/Low Income RHNA Candidate Sites

CALCULATION METHOD

The net acreage for each candidate site was calculated based on the gross acreage (for all parcels included in the site) minus the acreage deemed partially or completely undevelopable based on existing steep slopes and known environmental constraints. Environmental constraints were determined based on known site information for the parcels where that information was available and other sources, such as the City's Local Coastal Program and site observations. **The site capacity was determined by applying a 25 du/ac standard to the net acreage for each candidate site.**

The following calculation methods apply to slope constraints (per the City of Encinitas Municipal Code for purposes of calculating density):

- All land in 0-25% slope of natural grade is allowed to use 100% of acreage.
- All land in 25-40% slope of natural grade is allowed to use 50% of acreage.
- All land in 40% + slope of natural grade is allowed to use 0% of acreage.

All acreages shown on the following sheets include any applicable acreage deductions from the gross acreage. The informational sheets include a note either stating that there were no known topographic or environmental constraints or detailing the acreage removed from the gross acreage and the reasoning.

WATER AND SEWER AVAILABILITY

As discussed in Appendix B, each site has been evaluated to ensure there is adequate access to water and sewer connections. Each site is situated adjacent to a public street that has the appropriate water and sewer mains and other infrastructure to service the candidate site.

DEFINITIONS

Vacant Parcel: HCD has stated to the City that vacant parcels must be unimproved. Sites containing abandoned, non-habitable, or vacant structures or powerlines are considered to be non-vacant by HCD unless the owner has applied for, and been issued, a demolition permit. Similarly, vacant portions of parcels designated for housing development are considered by HCD to be non-vacant unless the vacant portions of the site have been subdivided from the non-vacant portions. The designations of vacant and non-vacant parcels in this Appendix C conform to the direction provided to the City by HCD.¹

Non-Vacant Parcel: Non-vacant parcels are underutilized or developed parcels and contain existing development or established uses. These may include temporary structures associated with an active use (i.e., agricultural greenhouses) or other uses currently operating on the site.

Mixed-use Site Capacity: For mixed-use sites within the Encinitas North 101 and Downtown Specific Plan areas, capacity was calculated per Section 3.1.2.D of the Specific Plan, which states a maximum lot utilization of 90% and that residential uses shall not exceed 50 percent of the gross building floor area for the development site. The capacity of other mixed-use sites was determined based on the area available for housing development, largely determined by the owner.

Site Capacity: All parcels shown with fewer than 16 units are in common ownership with one or more adjacent parcels or are likely to be consolidated with one or more adjacent parcels based on owner representations. In these cases, the parcels are considered one site that can accommodate at least 16 units.

Owner-Interest: Sites with "owner interest" listed in the description indicate that the City has been directly contacted by the property owner and received an acknowledgement of their interest in writing, either by email or by a formal letter.

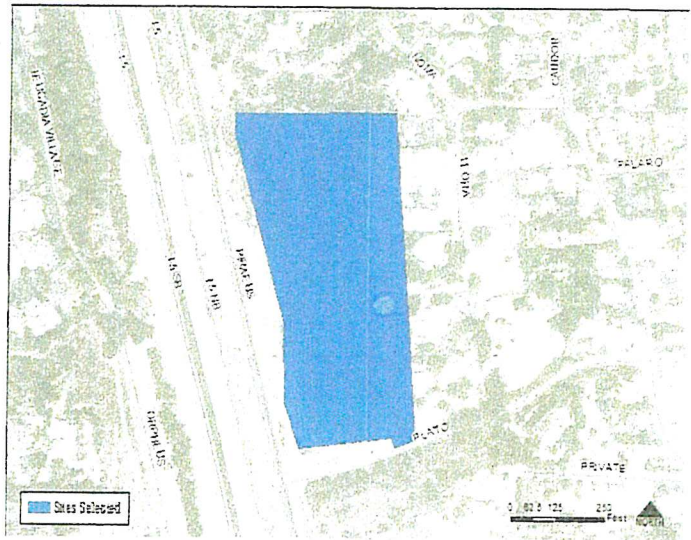
NOTES:

¹The City believes that vacant portions of parcels designated for housing development and sites containing only abandoned, non-habitable, or vacant structures or powerlines should also be considered to be 'vacant' because they contain no existing use that prevents an owner from developing the site.

CANNON PROPERTY (PIRAEUS) SITE NUMBER 02

SITE DESCRIPTION

This site is a vacant property at the corner of Piraeus Street and Plato Place, both of which are 2-lane local streets. The southern portion of the site is flat due to previous grading, with the majority of the rest of the site sloping up towards a flat pad on the northeast corner. The owner has expressed interest in developing this site for residential uses.



SITE FEATURES

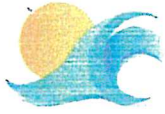
- Vacant, natural landscape
- Partially graded
- Some mature trees/vegetation on the northern portion of the site
- Slight topography change

PARCEL SIZE CALCULATION

There are no known physical constraints to development due to steep slopes or environmentally sensitive areas. Therefore, the parcel's net acreage equals the full gross acreage.

APN(S) (Ownership)	2541440100 (CANNON MARIA T)	PARCEL SIZE (AC) (GROSS/NET)	6.93/6.93
SITE STATUS	Vacant	MAXIMUM DENSITY	30 DU/AC
ADDRESS(ES)	Piraeus Street	MINIMUM DENSITY	25 DU/AC
NEIGHBORHOOD	Leucadia	UNIT CAPACITY	173
GENERAL PLAN LAND USE	Rural Residential 1.01-2.00 (RR2)	CONSTRAINTS	<ul style="list-style-type: none"> • Slight Topography (less than 25% slope, so no deductions)
ZONING	RR2		





ENCINITAS
COMMUNITY
COLLECTIVE

Appendices E-2

From: [Alan Deremo](#)
To: [Nick Koutoufidis](#)
Cc: encinitascommunitycollective@gmail.com
Subject: Piraeus Point
Date: Tuesday, June 28, 2022 12:08:30 PM

[NOTICE: Caution: External Email]

Mr. Koutoufidis,

I am a resident of the neighborhood adjacent to the proposed Piraeus Point development, specifically on Caudor St. just south of Plato Pl.

I attended the recent community meeting presented by the reps from Lennar, and it raised some concerns for me about the viability of this project as proposed, mainly in the following areas:

Parking:

I don't see how the proposed number of parking spaces within the development is anywhere close to being adequate. As there is almost no legal street parking nearby I do not see where any overflow would go. A solution might be to widen Piraeus and create street parking, but it seems like that would be costly - and potentially dangerous given the typical speed of vehicles that street.

Traffic flow:

I thought the traffic study presented at the meeting was laughable - there was clearly no consideration of the increased traffic that occurs twice daily when school is in session at Capri Elementary, even though the reps insisted there was. With increased population in the area I can't imagine the intersections at Piraeus/La Costa Ave., Saxony/Leucadia Blvd. and Urania/Leucadia Blvd. not being exponentially more burdened, especially at 8am. The Lennar reps suggested that drivers would use La Costa to exit the area - that would seem logical, but you can't exactly force people to use that route, particularly if they are headed toward inland Encinitas or other destinations where Leucadia Blvd. is a much more direct route.

One solution might be to reopen an I-5 south on ramp at Piraeus just N of Leucadia Blvd. I understand that wouldn't be an action the city could take, but it would definitely help.

My greater concern is egress in case of a fire or other emergency. With the above mentioned intersections being the only exits from the neighborhood, the increased population from the proposed development would create an additional burden on those exits, making a mass exodus all but impossible.

Pedestrian safety:

At present Plato Pl. is not very safe for pedestrians, being narrow with a somewhat blind turn and lacking sidewalks. If any kids from the proposed development walked to Capri. Elementary via Plato they would be greatly at risk.

Overall concept:

I understand the parcel in question is already rezoned for high density housing, but it is obvious that a development of this type is utterly out of place amid the semi-rural character of the neighborhood, not to mention the practical considerations that have to be addressed. Several attendees at the meeting made comments along those lines, and the Lennar reps responded with something like "Well, if you don't accept our plan someone else will come along and build a development that is more dense and not nearly as nice or compatible with the neighborhood as ours." That seemed to me an insensitive and cynical response when the purpose of the meeting was community outreach.

Thank you for your time,
Alan Deremo

From: [Bill Wickett](#)
To: [Nick Koutoufidis](#)
Cc: Encinitascommunitycollective@gmail.com
Subject: Piraeus Point
Date: Saturday, June 25, 2022 9:44:44 AM

[NOTICE: Caution: External Email]

Bill and Maryann Wickett
1584 Caudor Street
Encinitas, CA 92024

To:
Mr. Nick Koutoufidis
Senior Planner
City of Encinitas

Increasing the housing density to maximize profits for the Piraeus Point project is a terrible idea, and inconsistent with previous planning by the City of Encinitas.

In the 1970, the decision was made to develop this part of Leucadia for a maximum of two houses per acre. That course of action set the criteria for the local infrastructure. Electrical load and other utilities were designed around this population density. Narrow streets were all that were needed to carry the traffic of a low density area. Early on, sidewalks were unnecessary as car trips were low, and school busses carried children to Capri Elementary School. For about fifty years, the planning department made their calculations and plans based on this lower density. Almost all lots have now been developed into houses, and these previous plans have worked out well. We have enough water delivery, the electric delivery system is adequate, and despite the traffic congestion around Capri, the streets can handle the needs of the neighborhood.

However, we are close to the maximum sustainable housing level. A good indication of that is the traffic congestion that plagues Caudor and Capri streets during the morning drop-off and afternoon pick-up for the elementary school. Further problems were created when the south end of Piraeus was blocked by the Leucadia Boulevard freeway onramp.

But now, the city is choosing to disregard years of planning and development, to allow high density housing. You can't just approve this project without upgrading existing infrastructure. Water, electrical and sewer must all be expanded. That's a costly undertaking, guaranteed to cause an unpopular disruption to those of us who live in the neighborhood.

But the biggest problem you face will clearly be traffic congestion, and if this high density windfall is approved, no good options exist. Long term, streets will need to be widened from Piraeus to Leucadia. That includes the area around Capri Elementary School, where these families will attend classes. Can the city afford a project of this size? How about the inconvenience to all who live along those streets? That's a lot of people who will be disappointed at the lack of foresight by the city and the Planning Department. Plan B might be to just do nothing, but the gridlock will be VERY

unpopular.

What's the point? Is this high density housing worth the expenses it will produce? The city gets nothing from the switch to high density. Instead, the costs will be huge. I urge you to return to two units per acre and save us all a lot of grief.

Sincerely,
Bill Wickett

From: [Brian](#)
To: [Nick Koutoufidis](#)
Cc: [Encinitas community collective](#)
Subject: Piraeus Point Proposed Project
Date: Friday, June 24, 2022 3:07:25 PM

[NOTICE: Caution: External Email]

Hello Nick. As a resident of Leucadia, I have several concerns regarding the proposed project at Piraeus Point. I am thankful for the oversight of you and or your committee and hopeful that when time permits these concerns could be acknowledged and addressed.

Thank you in advance for reading my message and for your thoughtful consideration.

Fire

- Has the city studied or requested a study of the traffic pattern likely to occur in the event of a fire?
- Has this study taken into consideration traffic needing to go from Piraeus Point to Capri to pick up school children?
- With the increase of residents, is the city confident that existing residents will be afforded safe evacuation in the event of a fire?

School

- Capri is near capacity. Where is the city proposing residents of Piraeus Point send their kids to middle school?
- Has the city considered or proposed a new school to be built?
- If a proposed school is to be built what is the expected timing for new students and where would residents of Piraeus Point go in the meantime?
- Has the city proposed a solution that would provide schooling for the new residents of the several new projects including Piraeus Point, Fox Point, and others?

Safety for kids walk to school

- Does the city plan to install or require the builder to install sidewalks on Plato between Piraeus and Caudor?
- Is there a plan to address walk to school safely? Kids walking from Piraeus Point on Plato with no sidewalk would present a safety issue for both kids and cars.

Parking

- Has the city proposed a solution for visitors to Piraeus Point for parking? The builder indicates very few spots for visitors. With no parking on Piraeus, Plato or Sky Loft where is the city proposing people park?

Water

- Does the city have a proposal to address water shortage for the current residents already under restriction with the addition of 149 homes?
- Adding 149 homes would present a significant need for water impacting current residents. Has the city proposed a solution so current residents are not negatively impacted?

Utilities

- How does the city propose to handle needed improvements to utilities?
- Sewer?
- Drainage?
- Electrical?

Street lighting

- With the increased traffic flow is the city proposing a streetlight at the intersection of Plato

and Piraeus?

- How is the city addressing the increase in traffic at Piraeus and Plato to ensure safety for new residents and existing residents?

Traffic flow

- Has a study been done or requested studying the impact of increased traffic flow through the neighborhood streets as a result of there being no 5-south exit by way of going south on Piraeus?
- Has the city done or requested a study to see how many people access 5 south via La Costa? It appears that very few residents today go north on Piraeus to access 5 south via La Costa. At the June meeting the builder indicated that they expect residents of Piraeus Point to go this route to 5 south. This seems unlikely given that very few current residents go this route.
- Does the city have plans to open the 5 south going southbound on Piraeus?

Thank you, Nick.

Brian Howarth

From: [Candice Shine](#)
To: [Nick Koutoufidis](#)
Subject: Piraeus Point comments
Date: Friday, June 17, 2022 6:10:01 PM
Attachments: [CPP.pdf](#)

[**NOTICE:** Caution: External Email]

Per your signed letter dated May 20, 2022 - attached please find mine and my husband's comments as it relates to the Piraeus Point project.

Sincerely,

Candice Shine and Randy Venier

COMMENTS

Case Nos. MULTI-005100-2022; GDP-005101; DR-005100-2022; BLD-005100-2022
Piraeus Point

1. Do the documents and presentation clearly identify the scope of the project? (Yes or No)

The additional 300 cars will severely impact all streets and intersections around the Piraeus Point Development (PPD) – Skyloft, Plato, Olympus, Normandy Rd and Piraeus. With no plans for stop signs or stop lights or improvements to Piraeus St., these additional vehicles will be at risk of safety for themselves and other commuters when entering and leaving the PPD. Piraeus St., also has a designated bicycle lane going both north and south and a portion of the street is designated sharrow putting the bicyclist at a greater risk for their safety.

2. Do you have any other issues or concerns regarding further action? (Yes or No; if Yes, please explain)

When there is an accident (weekly) on Interstate 5 north prior to La Costa off ramp, interstate drivers use Piraeus to get around the accident. The cars are lined up on Piraeus to the La Costa Ave traffic light to get back on 5 north. Most times the cars are blocking the intersections for residents to enter or leave their community.

Residents near and around the proposed PPD already deal with (not happily) the additional cars in the morning and afternoon for the Capri school drop off and pickup.

The streets in and around this proposed project can NOT handle the additional vehicles it will bring.

NAME (please print):

CANDICE SHINE

ADDRESS:

952 WANTE MIRAGE

COMMENTS

Case Nos. MULTI-005158-2022; CDP-005161; DR-005160-2022; SUB-005159-2022
Piraeus Point

1. Do the documents and presentation clearly identify the scope of the project? (Yes or No)

NO! The increased traffic and impacts are almost completely ignored!

2. Do you have any other issues or concerns requiring further review? (Yes or No; if Yes, please explain)

The environmental impacts to this endangered coastal scrub habitat are irreversable and unconscionable!

NAME (please print):

Randy Venier

ADDRESS:

952 Monte Mira Dr.
Director, Environmental, Health & Safety
Bachem Americas

RECEIVED
JUN 23 2022
CITY OF ENCINITAS

SAN DIEGO CA 920
21 JUN 2022 PM 5 L



ATTN: MR. KOUTOFLIDIS
City of Encinitas
Development Services Department
505 S. Volcan Ave.
Encinitas, CA 92024

92024-369999



Ms. Charlene Buckalew
1720 Barbara Ln
Encinitas, CA 92024



City of Encinitas
Development Services Department
505 S. Vulcan Ave.
Encinitas, CA 92024

Re: Project Title Pireaus Point
Project Applicant Lennar Homes of California, LLC
Project Location NE Corner of Pireaus St. and Plato Pl., Encinitas, CA 92024
County Assessor Parcel Nos. 254-144-01 and 216-110-35-00

Project Case Numbers MULTI-005158-2022; CDP-005161-2022; DR-005160-2022; SUB-005159-2022;
and SUB-5005391-2022

Dear Mr. Koutoufidis,

The proposed project does not fit in with the current community rural/residential character of the neighborhood. I expect this would change the entire life style for this neighborhood. The quality of life and livelihood.

The traffic issue is a major concern, I currently go north on Pireaus St. to go to work. I would need to add minimum 15 minutes per day each direction just to get to the freeway. There is no doubt adding a minimum of 300 cars to one small community and street will make getting to the light at La Costa Ave. a serious congestion issue each day. Then consider when there is an accident on the freeway and the highway patrol diverts everyone onto Pireaus St. to get around the accident.

The project does not have enough parking for even 300 vehicles and there is no parking on Pireaus St. or Plato Pl. So imagine how much the neighborhood will like having cars parked all over the streets. The situation that already happened when the city built a park on Olympus without parking. They ruined the neighborhood.

The neighborhood school from my understanding is already almost at capacity. How will they accommodate the new residents, potentially adding 150 kids just on a low number? Another issue is the children will walk to school up Plato Pl. No sidewalks to safely walk to school. So is the solution let's put those 150 cars on the road to take the children to school? Already congested side streets that cannot accommodate another 150 cars.

There is no thought to how those 300 plus cars will enter and exit through one entrance on Pireaus and still allow the current residents in the neighborhood to get onto Pireaus.

The project is to be built on 4.5 acres when they are saying this is an 11.8 acre site. The truth is, only the 4.5 acres have the potential for building. The entire acreage is not open to build.

This project is in a high fire zone, so we are added another potential 300 people that have only one way out of the area. The traffic with everyone potentially trying evacuate would be awful. No way for fire trucks to get in with everyone trying to get out. Think about the people who have lived here for years and how it will impact their homes and lives.

Sincerely,



Encinitas Residents
Charlene Buckalew

From: [Daniel Baxter](#)
To: [Nick Koutoufidis](#)
Subject: RE: Please add me to the Piraeus Point Townhome CPP mailing list
Date: Monday, June 6, 2022 11:17:24 AM
Attachments: [image001.jpg](#)

[NOTICE: Caution: External Email]

Hello Nick,

Thanks for adding me to the list.

Can you also provide me with a link to (or invitation to view) the sharepoint that has the Lennar side development plan. I'd like to see the plan view, as well as some of the elevations to get a better sense of the proposal. The link I had seems to no longer be active.

Regards,

Dan Baxter

From: Nick Koutoufidis <nkoutoufidis@encinitasca.gov>
Sent: Tuesday, April 12, 2022 5:31 PM
To: Daniel Baxter <danbaxter@cox.net>
Subject: RE: Please add me to the Piraeus Point Townhome CPP mailing list

Hi Daniel,

I will add you to the list for this project.

Thanks for letting me know.

Best,



Nick Koutoufidis, MBA
Development Services Department
505 South Vulcan Ave, Encinitas, CA
P: 760.633.2692

From: Daniel Baxter <danbaxter@cox.net>
Sent: Monday, April 11, 2022 6:28 PM
To: Nick Koutoufidis <nkoutoufidis@encinitasca.gov>
Subject: Please add me to the Piraeus Point Townhome CPP mailing list

[NOTICE: Caution: External Email]

Hello Nick,

I understand that you are the person to contact to get added to the CPP notification (and

participation) list regarding the proposed Piraeus Point Townhome development (at Piraeus and Caudor Streets, Encinitas).

I would like to be on the list for any other general notifications regarding this property as well. If you are not the correct contact person, please let me know who is.

I prefer email to paper, but contact information for both is below.

Thanks in advance.

Daniel Baxter

1627 Caudor St.

Encinitas, CA 92024-1219

danbaxter@cox.net

From: [Daniel Baxter](#)
To: [Nick Koutoufidis](#)
Subject: EIR Comments from interested parties - Piraeus Point Case Nos. MULTI-005158-2022; CDP-005161; DR-005160-2022; SUB-005159-2022
Date: Thursday, June 23, 2022 6:01:22 PM
Attachments: [Dan Baxter, Piraeus Point EIR Concerns Letter to Nick Koutoufidis 20220623.docx](#)

[NOTICE: Caution: External Email]

Dear Mr. Koutoufidis,

Attached please find my EIR comments related to the proposed Piraeus Point development by Lennar Homes of California LLC.

If you have any questions, or any difficulties opening the attached Word document, please let me know.

Thanks for your consideration.

Dan Baxter

From: Daniel E. Baxter
1627 Caudor St.
Encinitas, CA 92024
danbaxter@cox.net

To: Nick Koutoufidis, Senior Planner,
Encinitas Development Services Department,
505 S. Vulcan Avenue, Encinitas, CA 92024,
nkoutoufidis@encinitasca.gov

June 23, 2022

RE: EIR Comments from interested parties – Piraeus Point
Case Nos. MULTI-005158-2022; CDP-005161; DR-005160-2022; SUB-005159-2022

Dear Mr. Koutoufidis, Planning Dept. Reviewers, and other interested parties;

I am aware of the proposed 149 unit development at Piraeus Point by Lennar Homes of California, LLC. I have spoken to many neighbors, and have attended the CPP meeting. I strongly share the predominant sentiment of nearby residents that this density of development is inappropriate for and not in keeping with the rural residential character of the neighborhood. I remain hopeful that city council will change course, respecting the will of their constituents, and remove this site from the housing element. But in case they do not, I have several site-specific concerns that I believe are relevant to the planning review and EIR process for Piraeus Point. I've included some mitigation suggestions, some of which may be feasible. In my order of priorities, the key issues are Inadequacy of Planned Parking, Traffic Control, Pedestrian Safety, and Noise Management.

Lennar has control over, and should be held accountable to mitigate some of the plan deficiencies. Others issues require City action. To the extent possible, I urge the planning department (and City) to transfer or at least share the cost of mitigations with the developer. Only in this manner will the full costs of development accrue to those who benefit from it.

1. PARKING: Off street parking within the project is substantially below what is historically required for development of this scale, and is much less than is foreseeably needed, especially visitor parking.
 - 1.1. The total number of planned parking spaces (256) is 42% below the minimum number required by Encinitas Code 30.54.030, a deficit of 109 spaces.
 - 1.2. The total number of planned spaces is 91 to 96 fewer than required if Ordinance 2021-12 if applied to the inclusionary units (depending on the number of bedrooms in the inclusionary units).
 - 1.3. The planned 10 guest spaces, in total, amounts to less than 1/3 of the number reasonably needed, based on City of Encinitas Codes, as well as codes in nearby cities, and common sense.

I believe THE CURRENT PARKING PLAN IS INADEQUATE TO MEET BASIC HEALTH, SAFETY, AND HABITABILITY NEEDS of the residents. The excess of vehicles that can be reasonably expected in the development will have to park somewhere, and the likely places are on the narrow and already congested local streets (exacerbating traffic problems and creating new safety issues), or on nearby private property.

Failure to plan for and provide adequate parking as part of this development reasonably and foreseeably jeopardizes the safety of pedestrians and vehicles on nearby streets. It also negatively impacts the quality

of life for all neighborhood residents. In my opinion, this is the single most important deficiency in the current development plan.

Several mitigation strategies are available, and might include one or more of the following:

- 1.4. Reduce the number of units and/or number of bedrooms to reduce the parking demand.
- 1.5. Increase the available on-street parking on nearby streets.
 - 1.5.1. The closest, probably cheapest, and therefore most obvious candidate is parking on Piraeus. Though this right of way is a city responsibility, developer funding for necessary changes should be sought if this option is pursued.
- 1.6. Add more parking spaces within the development through any combination of approaches, possibly including:
 - 1.6.1. Build a parking structure, as is common in higher density projects elsewhere. If the typical steel and concrete design does not meet aesthetic standards, it could be “disguised” in a number of ways. (Costs associated with the parking structure might be recoverable through resident use fees (e.g. permit access), or HOA fees, as is common practice in “high rise”.)
 - 1.6.2. Build below grade parking, possibly below the planned structures facing Piraeus. This implementation of the suggestion above does require additional excavation and structure, but it may offer lower impact on the overall aesthetics. If the entrance is from Piraeus, which seems like the obvious choice, it might actually reduce the traffic within the development – a double benefit to residents.
 - 1.6.3. If the power lines at the eastern border of the property were buried underground (at least for some or all of the south to north length of the development area), the massive retaining wall could be “pushed back” to the property line. Then perhaps some of the existing utility easement could be used for parking. (Obviously, this depends on SDG&E requirements allowing more limited access over underground lines versus access below overhead lines. Preliminary questioning suggest that regular access is only needed for transformers and pull points, but this would have to be verified by an authoritative source.) Unrestricted ongoing SDG&E service access to the remaining overhead power lines to the north might be achieved by connecting the existing easement north of the development with the driveway at the north east corner of the development, possibly with a ramp, or possibly along the easement where the power lines feed Leora Ln. The planned fire lanes within the development should already provide adequate unrestricted access within the development area. (Note too that the normally high cost of underground utilities may be reduced because the required excavation and backfill operations could be incorporated into the excavation for the retaining wall (i.e. bury the power lines behind the retaining wall before backfilling). Perhaps some of the additional cost of undergrounding might be shared by the SDG&E underground utilities fund. In addition to the parking benefit, this potential approach improves the general aesthetics for the residents of the new development, and the views for those in the houses above (to the east), and to a limited extent reduces the fire danger associated with overhead power lines.
 - 1.6.4. Create a row of parking at the northern border of the development. If there is a 10 foot setback available, this space could accommodate parallel parking with no additional driveway requirements. If a few feet of additional space can be “found” it would allow “nose in” parking, roughly doubling the number of additional spaces (versus parallel parking). This might be achievable by slightly shifting the entire development south to gain a few feet of the flatter space, or by taking a few feet of the “preserve” space at the northern border (and possibly building a larger retaining wall). Parking in this location would not be as visible as some of the suggestions above.
 - 1.6.5. Sacrifice some of the planned landscaping to add parking spaces. The inside ends of the units appear to have planters. These could inexpensively be replaced by additional parking spaces.

(Admittedly this is not the prettiest approach, and therefore not the first choice of anyone who has to live in or see the development, but safety has to come first.)

1.6.6. Setbacks at the outside edges of the development might provide the opportunity for more code complaint spaces at relatively low cost, especially near the ends of the planned driveways.

(Though not as attractive as trees, this scheme would distribute additional spaces in a way that is probably most favorable to residents and visitors).

1.7. Consider if a few motorcycle spaces can be squeezed in to help ameliorate the parking shortage.

2. TRAFFIC: Regardless of which traffic model is used (i.e., the assumed number of car trips per day and where they will go), there will certainly be an increase in demand on roadway infrastructure, and given the large number of units being added to the neighborhood it will probably be a significant increment of increased demand, particularly if the cumulative impacts of the multiple Leucadia development sites are considered. There are three existing traffic bottlenecks that this new development will exacerbate most, at least two of which can be easily improved.

2.1. Probably the worst problem is the backup that occurs twice daily around Capri Elementary School.

Traffic backs up down Caudor street, so that southbound traffic gets gridlocked. While the existing problem is probably not within Lennar's scope of influence, there is a simple method to reduce the increase in this problem that is within Lennar's scope. As has been previously suggested to Lennar representatives, making the Piraeus Point south exit onto Plato a "For Emergency Use Only" exit should be done to divert ALL regular traffic from the new development onto Piraeus. Hopefully, all northbound traffic, and most of the southbound traffic, will opt for the La Costa onramp to I-5, but even if they drive directly south, this approach discourages drivers from going directly up Plato. This minimizes the impact on the narrow neighborhood streets south and east of Piraeus Point. (Lennar should incorporate this into their plans.)

Note: this was agreed to in the CPP presentation – but is not yet reflected in the plans. A specific Emergency access control mechanism has not yet been defined, but it should not simply be signage.

2.2. Currently, Northbound traffic on Piraeus sometimes gets "gridlocked" at the La Costa Ave. light, and this can only get worse if a significant portion of the traffic from Piraeus Point goes that way (as is implied by the current traffic model). The backup is caused by two separate contributors that are closely related, and both can be significantly and probably inexpensively improved. (This intersection may be within the City of Carlsbad jurisdiction. Perhaps Lennar can influence the cities to remedy this.)

2.2.1. The first problem, has a cheap fix. The left turn lane to go from northbound Piraeus to westbound La Costa Ave can only accommodate about 4 cars. Once there are 4 or 5 cars waiting at this long light, both right turn traffic and left turn traffic back up. (The right turners can't get around the left turners who block the single northbound lane on Piraeus). In some cases drivers, especially those in high clearance vehicles, drive on the dirt shoulder on the east side of Piraeus to get into the right turn lane (to go east on La Costa Ave.) This pattern is evidenced by the tire tracks and reduced plant growth along the eastern shoulder of Piraeus approaching the La Costa Ave light. This situation can be easily and relatively inexpensively reduced in severity by slightly increasing the width of the blacktop on Piraeus for approximately 150 feet along the approach to La Costa Ave, enabling the left turn lane (and right turn lane) to be lengthened correspondingly. See attached conceptual drawings (page 7 below). This approach would reduce the backup at the light by allowing more right turn vehicles to get out of the queue.

2.2.2. The second contributing factor is the limited amount of space available for the cars that are able to make the left turn from Piraeus onto La Costa Ave (westbound) before they are stopped at the "Park and Ride" stoplight. Approximately 4 cars can fit in the right lane of westbound La Costa Ave (to get onto the northbound I-5 onramp), before the left turners behind them get backed up into the Piraeus / La Costa intersection. As a result, sometimes drivers attempting to turn left from Piraeus northbound to La Costa westbound have to wait for more than one (long) cycle of the light before they can make their turn, or they turn left into a different lane, and try to quickly move to

the right when the light changes. This both exacerbates the problem listed in (i) above, and the risk to cyclists in the westbound bike lane on La Costa Ave. The simple remedy for this problem is to adjust the timing of the westbound La Costa Ave light at the Park and Ride so that it stays green longer, while the Piraeus northbound traffic is turning left. (In conjunction with 2.2.1 above, this would approximately double the number of cars that could turn left from Piraeus to La Costa Ave in a single cycle of the light.)

2.3. A third local bottleneck exists at the corner of Urania and Leucadia Blvd. Since Piraeus southbound no longer goes through to Leucadia Blvd, most of the southbound Piraeus traffic is diverted up Normandy (or other small streets) to Urania southbound. From southbound Urania, drivers seeking to get to the I-5 freeway southbound must make a right turn onto Leucadia westbound, and quickly get into the left lane. At peak times they often can't do so, at least not without waiting for more than one cycle of the light. (This is due to the backup of cars on Westbound Leucadia Blvd attempting to go south on I-5.) As in the case above (2.2.1), the turn lanes on Urania are short, so all the traffic queues up. (The situation was recently made even worse by the repainting of the southbound right shoulder line to create parking spaces where right turners previously queued up. Change it back!. Urania is already developed along this stretch, so other road changes analogous to those above (2.2.1) are probably impractical. However, it may be worthwhile to study the signal timing to see if better flow can be achieved to relieve this backup. Shouldn't the City of Encinitas address this? I hope Lennar has the influence to make this happen. Please!

3. Pedestrian Safety

3.1. It is reasonable to anticipate that 149 new housing units targeted as "starter homes" will attract some families with elementary school age children. Planning for a safe walking path to school seems prudent, if only to limit City liability. Lennar's current plan shows pedestrian pathways on the east side of Piraeus, and the north side of Plato. While this is good, it is not sufficient. To provide safe transit to Capri Elementary, a walking path should run up Plato, from Piraeus to Caudor Street. Depending on which side of Plato the walkway is added, a crosswalk and possibly additional stop signs on Caudor at Plato may be necessary to complete the safe passageway. A little leadership in this planning may help to avoid some easily foreseeable bad outcomes. Note: In the CPP meeting, Lennar representatives suggested that they may be willing to "support" this walkway extension.

4. Noise

4.1. To the extent possible, if rooftop decks must be retained in the project design, moving the decks away from the eastern roof edge, and perhaps moving any rooftop protuberances or aesthetic barriers closer to the east edge may help to mitigate (reflect and absorb) sound that will otherwise travel "line of sight" to the eastern neighbors. The roof deck layout has many constraints, so this may not be feasible everywhere, but anywhere where it can be done may offer an increment of improvement.

4.2. Selection of sound absorbent deck and barrier materials may also provide some noise relief.

Piraeus Point Parking Deficiency - Key Take-Aways:

- 1) The total number of planned parking spaces is 109 fewer than would be required by Encinitas Code 30.54.030.
- 2) There are 96 fewer planned spaces than would be required by applying Ordinance 2021-12 to the inclusionary units.
- 3) The planned number of resident spaces matches the number required under State Density Bonus Law 65915.
- 4) The planned 10 additional guest spaces exceeds the total absence of a requirement in the California Density Bonus Law (as I understand it), but is less than 1/3 of the anticipated need, based on prior City of Encinitas Codes.

CONCLUSION: While the number of planned parking spaces appears to meet or exceed the number required under California State Density Bonus Law 65915, based on prior codes, ordinances, and planning guidelines, the planned on-site parking is not sufficient to meet the needs of tenants and visitors, and an overflow of on-street parking to the adjacent neighborhood streets is easily foreseeable. This overflow and consequent public hazards should be included in impact analysis and planning for the project.

Sources/ References:

[https://library.qcode.us/lib/encinitas_ca/pub/municipal_code/item/title_30-chapter_30_54-30_54_030_30.54.030 Schedule of Required Off-Street Parking. \(qcode.us\)](https://library.qcode.us/lib/encinitas_ca/pub/municipal_code/item/title_30-chapter_30_54-30_54_030_30.54.030_Schedule_of_Required_Off-Street_Parking_(qcode.us))

https://content.qcode.us/lib/encinitas_ca/alerts/documents/ordinance_2021_12.pdf

[ordinance_2021_12.pdf \(qcode.us\)](#)

Piraeus Point Notice of Preparation of a Draft EIR dated 5/25/2022

<https://ceqanet.opr.ca.gov/2022050516>

California State Density Bonus Law, Government Code 65915

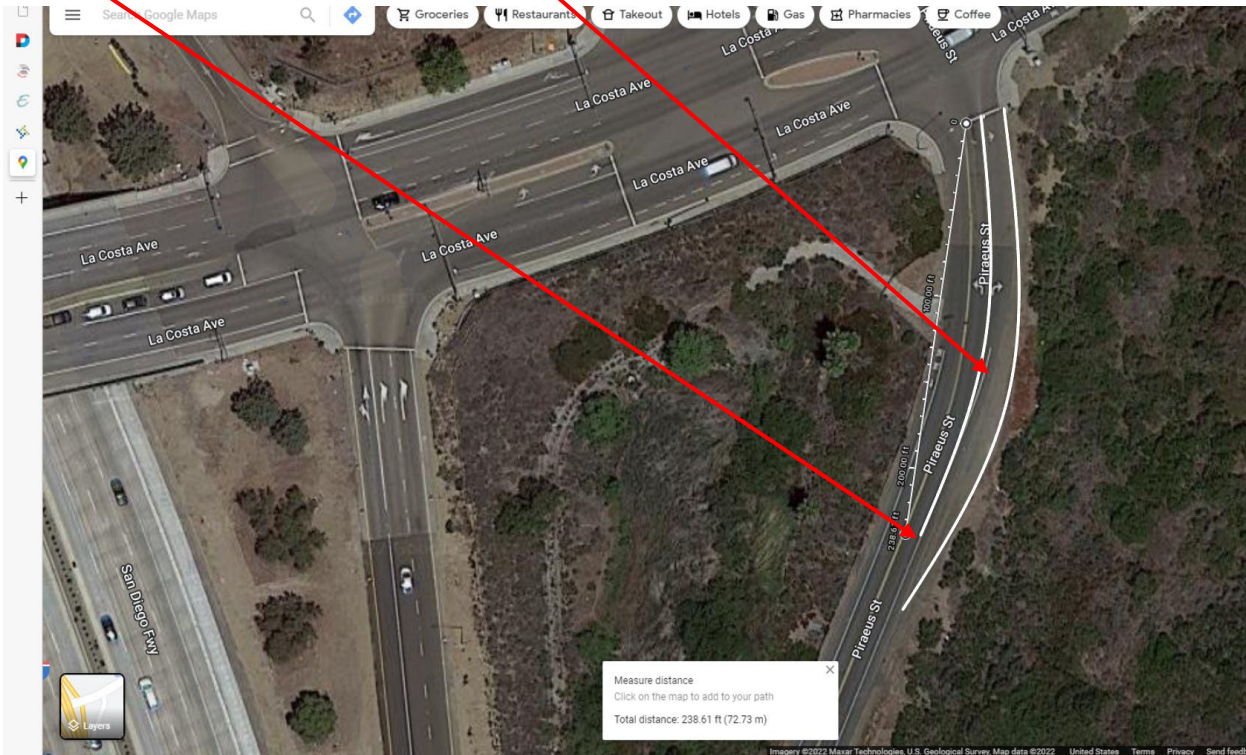
<https://www.novato.org/home/showpublisheddocument/31315/637322464237470000>

TRAFFIC MITIGATION: Piraeus northbound at La Costa Ave.

Google Maps view of Piraeus St intersection with La Costa Ave. Overlaid measuring scale shows the EXISTING approximately 100-foot-long turn lanes on Piraeus, which cause a backup queue once 4 or 5 cars are in the left turn lane.



Google Maps view of Piraeus St intersection with La Costa Ave. Overlaid measuring scale and white lines shows SUGGESTED FUTURE paving of the shoulder to allow extension of the turn lanes to approximately 250 feet in length to reduce the queue that forms at peak traffic times.



From: [Debbie](#)
To: [Nick Koutoufidis](#)
Cc: encinitascommunitycollective@gmail.com
Subject: Piraeus Point
Date: Thursday, June 23, 2022 6:01:54 PM

[NOTICE: Caution: External Email]

> Hello Nick,

> I'm writing to express my concerns of the proposed Piraeus Point project. The safety issues are number one. Traffic will be out of control and plus there is just 10 allotted parking spaces for the whole 149 units other than their own garages. It's silly to think that this is nothing but ridiculous. The walk the kids will need to take to get to Capri elementary school will be dangerous (no sidewalks) let alone the over crowding that the school will no doubt incur. Plus the kids will need to walk past a known "drug house" on Plato.

>

> With just one bottleneck entrance to and from the community this will become a a major issue if there is a fire, which is very real in this time of drought and the dryness of the land.

>

> I would like my voice to be heard that this community does not work on Piraeus.

>

> Thank you,

> Debbie Howarth

>

From: [Debbie](#)
To: [Nick Koutoufidis](#)
Cc: encinitascommunitycollective@gmail.com
Subject: Piraeus Point
Date: Friday, June 24, 2022 3:32:53 PM

[NOTICE: Caution: External Email]

Hello Nick,

I'm writing to express my concerns of the proposed Piraeus Point project. The safety issues are number one. Traffic will be out of control and plus there is just 10 allotted parking spaces for the whole 149 units other than their own garages. It's silly to think that this is nothing but ridiculous. The walk the kids will need to take to get to Capri elementary school will be dangerous (no sidewalks) let alone the over crowding that the school will no doubt incur. Plus the kids will need to walk past a known "drug house" on Plato.

With just one entrance to and from the community this will become a a major issue if there is a fire or emergency, which is very real in this time of drought and the dryness of the land.

I would like my voice to be heard that this community does not work on Piraeus.

Thank you,

Debbie Howarth

Sent from my iPhone

From: [Debra Long](#)
To: [Nick Koutoufidis](#)
Subject: Piraeus Point Townhome Project
Date: Wednesday, June 29, 2022 9:38:00 AM

[NOTICE: Caution: External Email]

To Whom It May Concern,

My father Wallace Amling and I live at 1650 Leora Lane, my father has lived here close to 50 yrs. Three generations of our family have lived in this wonderful, serene home, He is now 99 yrs old and has great health, which I am extremely grateful for. He has always valued his home for the peaceful neighborhood and views of the ocean. He has shown great pride of ownership over the years and about 35 yrs ago had his home remodeled by the now famous architect, Wallace Cunningham, who built "The Crescent House " in Encinitas that just listed for \$23.5 million. Will having these condos built right behind his home affect his property value?

We are concerned with the congestion of too many people living in an area that has not been designed to accommodate properly. If the parents want to take their children to school in the morning, all the traffic going up Plato to Caudor street will be dangerous. Those are small streets and children walking to school will be at risk. When I'm driving on Caudor I must drive pretty much down the middle of the road cautiously looking for oncoming traffic because the street is so narrow. Does the city plan to widen these roads and / or install sidewalks because of this project?

We are also concerned about the parking for this project, where are all the guests and extended family members that come to visit going to park? My understanding is they will have 10 guest parking spaces for 149 townhomes. That's ridiculous, we all know that won't be enough, so Plauto and Piraeus streets will be full of parked cars, That's also dangerous on Piraeus because now people have found out that this street eases the congestion on the fwy and use it as alternate route to La Costa Ave. They are driving very fast, and it's scary if you have to turn left up to Plauto, you have to judge the speed of the upcoming car before you make the turn. I'm also concerned about the noise this project will make and the toxic fumes from the soil, and dust it will generate, My father spends his days in his beautiful living room, with the sliders open to enjoy the cool breezes. Once the project starts this will no longer be able to happen.

Please don't do this, please reconsider this project, it's not the right space.

Thank you;
Debra Long
1650 Leora Lane
Encinitas CA 92024

From: [Dennis Kaden](#)
To: [Nick Koutoufidis](#)
Subject: RE: Notice of Preparation for the Draft EIR for the Piraeus Point Project (MULTI-005158-2022)
Date: Friday, May 27, 2022 9:13:05 AM
Attachments: [image001.jpg](#)

[NOTICE: Caution: External Email]

Nick,
Thanks much for the NOP.
Happy Friday!
DK

From: Nick Koutoufidis [mailto:nkoutoufidis@encinitasca.gov]
Sent: Thursday, May 26, 2022 7:06 PM
Subject: Notice of Preparation for the Draft EIR for the Piraeus Point Project (MULTI-005158-2022)

Hello,

Please see the attached Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the Piraeus Point Residential Subdivision project.

COMMENT PERIOD: Please send your comments to Nick Koutoufidis, Senior Planner, Encinitas Planning Division, 505 S. Vulcan Avenue, Encinitas, CA 92024, or via email to nkoutoufidis@encinitasca.gov. All comments must be received by no later than **5:00 p.m. on June 29, 2022**. This Notice of Preparation can also be reviewed at the Encinitas Library at 540 Cornish Drive, Encinitas, CA 92024 and the Cardiff-by-the-Sea Library at 2081 Newcastle Avenue, Cardiff-by-the-Sea, CA 92007.

Thank you.



Nick Koutoufidis, MBA
Development Services Department
505 South Vulcan Ave, Encinitas, CA
P: 760.633.2692

From: [Dennis Kaden](#)
To: [Nick Koutoufidis](#)
Subject: FW: Notice of Preparation for the Draft EIR for the Piraeus Point Project (MULTI-005158-2022)
Date: Monday, June 6, 2022 3:14:31 PM
Attachments: [image001.jpg](#)

[NOTICE: Caution: External Email]

Hello Nick,

Can my wife and I please visit with you tomorrow or Wednesday?

We have some questions regarding Piraeus Point Townhomes and would very much appreciate your clarification and advice.

Regards

Dennis

760-802-4556

From: Dennis Kaden [mailto:denniskaden101@gmail.com]
Sent: Monday, June 6, 2022 12:01 PM
To: 'Nick Koutoufidis' <nkoutoufidis@encinitasca.gov>
Subject: RE: Notice of Preparation for the Draft EIR for the Piraeus Point Project (MULTI-005158-2022)

Hello Nick,

Thanks again the NOP.

Can you please forward me the second application documents in a form other than the SharePoint format?

Thank you.

Dennis

760-802-4556

From: Nick Koutoufidis [mailto:nkoutoufidis@encinitasca.gov]
Sent: Thursday, May 26, 2022 7:06 PM
Subject: Notice of Preparation for the Draft EIR for the Piraeus Point Project (MULTI-005158-2022)

Hello,

Please see the attached Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the Piraeus Point Residential Subdivision project.

COMMENT PERIOD: Please send your comments to Nick Koutoufidis, Senior Planner, Encinitas Planning Division, 505 S. Vulcan Avenue, Encinitas, CA 92024, or via email to nkoutoufidis@encinitasca.gov. All comments must be received by no later than **5:00 p.m.** on **June 29, 2022**. This Notice of Preparation can also be reviewed at the Encinitas Library at 540 Cornish Drive, Encinitas, CA 92024 and the Cardiff-by-the-Sea Library at 2081 Newcastle Avenue, Cardiff-by-the-Sea, CA 92007.

Thank you.



Nick Koutoufidis, MBA

Development Services Department
505 South Vulcan Ave, Encinitas, CA
P: 760.633.2692

From: [Dennis Kaden](#)
To: [Nick Koutoufidis](#)
Subject: RE: Piraeus Discussion
Date: Tuesday, June 7, 2022 7:49:51 PM
Attachments: [image001.jpg](#)

[NOTICE: Caution: External Email]

Yes please.
Good idea Nick.
Thank you.
FYI, there will be a few more to come.
Best
DK

From: Nick Koutoufidis [mailto:nkoutoufidis@encinitasca.gov]
Sent: Tuesday, June 7, 2022 7:02 PM
To: Dennis Kaden <denniskaden101@gmail.com>
Subject: RE: Piraeus Discussion

Hi Dennis,

I am still in the initial stages of the project and nothing has been recommended and/or determined. Would you like your comment to be included in the Notice of Preparation comments?

Best,



Nick Koutoufidis, MBA
Development Services Department
505 South Vulcan Ave, Encinitas, CA
P: 760.633.2692

From: Dennis Kaden <denniskaden101@gmail.com>
Sent: Tuesday, June 7, 2022 5:56 PM
To: Nick Koutoufidis <nkoutoufidis@encinitasca.gov>
Subject: RE: Piraeus Discussion

[NOTICE: Caution: External Email]

Nick,
Hate to disappoint, but I gotta reschedule our meeting for a day next week.

However, I have a pressing question. Prop A limits the building heights.

How is it Piraeus Point Townhomes get to go three stories and above 35 feet?

Thank you Nick.

Regards

Dennis

760-802-4556

From: Nick Koutoufidis [<mailto:nkoutoufidis@encinitasca.gov>]

Sent: Tuesday, June 7, 2022 1:57 PM

To: denniskaden101 <denniskaden101@gmail.com>

Subject: RE: Piraeus Discussion

No worries, got you in the books.



Nick Koutoufidis, MBA

Development Services Department

505 South Vulcan Ave, Encinitas, CA

P: 760.633.2692

From: denniskaden101 <denniskaden101@gmail.com>

Sent: Tuesday, June 7, 2022 1:46 PM

To: Nick Koutoufidis <nkoutoufidis@encinitasca.gov>

Subject: RE: Piraeus Discussion

[NOTICE: Caution: External Email]

Nick,

Im having email issues today.

I do accept the meeting

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Nick Koutoufidis <nkoutoufidis@encinitasca.gov>

Date: 6/6/22 6:13 PM (GMT-08:00)

To: Dennis Kaden <denniskaden101@gmail.com>

Subject: Piraeus Discussion

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

[Learn More](#) | [Meeting options](#)

From: [Dennis Kaden](#)
To: [Nick Koutoufidis](#)
Subject: Request PP draft EIR
Date: Wednesday, June 15, 2022 7:00:32 PM

[**NOTICE:** Caution: External Email]

Nick,

Can you please email me the Piraeus Point draft Environmental Impact Report of May 2022?

Thank you

Dennis

From: [Dennis Kaden](#)
To: [Nick Koutoufidis](#)
Subject: Piraeus Point Landscape Question
Date: Tuesday, June 28, 2022 3:53:10 PM

[NOTICE: Caution: External Email]

Hi Nick,

Hope all is well with you today; and hope this is a quick & easy question.

Re: MUL TI-005158-2022; CDP-005161-2022; DR-005160-2022; SUB-005159-2022

Piraeus Point is submitted as 11+ acres, with both parcel A and parcel B combined.

Is the number of trees required 30 per acre?

If so, then are they to plant 330 trees? If only required to plant on the 4.1 buildable acres, then why are they allowed to claim the 11+ acres?

Thanks Nick and please call if quicker/easier for you.

Dennis 760-802-4556

From: [Dennis Kaden](#)
To: [Nick Koutoufidis](#)
Subject: Piraeus Point NOP EIR Comments
Date: Wednesday, June 29, 2022 3:41:58 PM
Attachments: [D.Kaden"s Piraeus Point EIR Comments to Nick v2.pdf](#)

[**NOTICE:** Caution: External Email]

Hello Nick,

Please find my comments for the NOP EIR regarding Piraeus Point.

Thank you for the opportunity as a resident of the community affected to make comments. Please read and respond. Can you kindly confirm receipts of this email?

Also, please feel free to contact me if you should need or want any additional information or assistance of any kind.

Regards

Dennis Kaden
1611 Caudor St.
760-802-4556

Dennis Kaden
1611 Caudor St.

Preparation of a Draft Environmental Impact Report

Piraeus Point

MUL TI-005158-2022; CDP-005161-2022; DR-005160-2022; SUB-005159-2022; and SUB-005391-2022

Nick,

Thank you for the opportunity to respond and make suggestions to the EIR regarding Piraeus Point per your Notice of Preparation.

Here are my EIR comments.

Aesthetics / Visual / Colors:

Project is in Scenic I-5 Corridor, therefore does not compliment the look of the community. Building's exterior designs do not fit in with neighborhood. Would prefer earth tone colors as greys and beige/browns. Use all stucco exterior to prevent exterior surface from long term weather and sun damage. Reduce or eliminate the box looking trim around windows. Though on private property, bury the utility power lines underground. (Ref: Circ. Element Policy 4.12 & Coastal Act/30251)

POLICY 4.12: Encourage undergrounding of utilities within street rights-of-way and transportation corridors. (Coastal Act/30251)

Air Quality:

Existing adjacent neighbors will be breathing dust from excavation and grading of pesticide contaminated soils during construction. Wind blows east virtually all the time. How do you protect them? Have developer pay for temporary relocation costs so residents are not affected. PP residents breathing I-5 fumes forever. How do you protect them? Can they ever open their windows?

Here is a new study to consider: <https://www.emissionsanalytics.com/news/gaining-traction-losing-tread>
Electric vehicles are producing far more pollution into the air. With PP's close proximity to I-5, the pollution generated via EV tire wear is much greater than tail pipe pollution. Please have this issue addressed in the EIR.

Biological Resources:

Gnatcatchers habitat. How to assure Gnatcatchers will be protected from this project into perpetuity.

Energy:

If No Natural Gas allowed, then bury the Utilities to protect resident's only electric supply.

Reference Circ. Element Policy 4.12

POLICY 4.12: Encourage undergrounding of utilities within street rights-of-way and transportation corridors. (Coastal Act/30251)

Environmental / Settings:

Building design, height, and bulk do not fit into existing neighborhood. Project is non-complimentary to neighborhood nor Scenic I-5 Corridor. How can Lennar lower heights, build less units, and overall lower density so projects compliments existing rural bluffs and neighborhood?

Geological / Soils:

Unstable Slope has fallen several times since the 2000's onto Piraeus St. Senior Archeologist, ECORE project manager John O'Connor admitted, they were unaware of the soil collapse and repositioning of soils, therefore, was ECORE's investigation sufficiently performed? Did they dig deep enough? Please consider this and that the property owner has stated the 'soil is unstable'.

Pesticides were used on site. How to remedy its safe removal?

Hazards & Hazardous Materials:

How to protect adjacent neighboring homeowners from pesticide/dust during the excavation and grading process. Require developer to pay for temporary living expenses, and cleaning. Additional hazard of no having a sidewalk or 'Safe Walk to Schools' on Plato. Build the sidewalk first. (Reference Circ. Element Policy 3.3 & 3.8 in Safety topic)

Hydrology / Water Quality:

We're in Stage 2 water restrictions. Why build high density and increase water usages only to then tell us to reduce water usage? Investigate this project's impact of 32 acre feet of annual water usage (along with Fox Point Farms, Sunshine Garden's, and all other R-30 projects in Encinitas) vs. existing community's water needs.

Land Use and Planning:

Poor site selection by City Council.

Slope restricts development. Doesn't fit in neighborhood. Out of character w/ community. City Council should consider removal of the R-30 designation and lower to 5 or 6 units per acre. Please ask our local builders who could purchase the property and build 50-100% low income units for an adequate profit. (Reference LAND USE POLICY 3.11 & 3.12; as only 4.1 acres are buildable) 3.12: a) Exception for Decrease in Intensity:

POLICY 3.12: A public vote shall be required on all City Council approved General Plan updates that are comprehensive in nature, and shall become effective only when a majority of those voters who cast ballots vote for the change. A comprehensive General Plan update shall be a City-sponsored work program titled as such that substantially changes and/or re-adopts the text and maps of the existing elements.

GOAL 4: The City of Encinitas will ensure that the rate of residential growth: (a) does not create a demand which exceeds the capability of available services and facilities; (b) does not destroy the quality of life and small town character of the individual communities; (c) does not exceed a rate which excludes the public from meaningful participation in all aspects of land use decision making regarding proposed projects; and (d) provides the City with the ability to plan ahead for the location, timing and financing of required services and facilities.

This project's density, height, and traffic are in violation with Goal 4. How can it be reduced in size?

This project is in violation of Goal 6 of the Land Use Element and the vote of the electorate via the defeat of Proposition U in 2018. Please explain what efforts will be made to maintain the existing community character?

**Compatibility
Between
Existing and
Future
Development**

Land use conflicts often arise when newer projects are insensitive to the use, character, or scale of existing development. These conflicts can over time lead to both deterioration and blight of both the older and newer homes or businesses. There are a number of ways potential conflicts can be resolved through proper planning in the early stages of project design. In addition, code enforcement is an important tool in ensuring that property is maintained. The following policies include measures to ensure that the existing character of development is maintained and that future development is compatible with existing land uses.

GOAL 6: Every effort shall be made to ensure that the existing desirable character of the communities is maintained.

Require Lennar to construct hand rails on all on-site sidewalks/pathways to aid pedestrian's walking up & down steep sloping walkways.

Though compliant with a newly adopted R-30 parking ordinance, Planning should recommend additional on-site parking for its resident's to benefit from a better quality project, or revert back to the former parking ordinance requirements. What can be done?

Consider SANDAG's use of its Mitigation Fund to purchase the property for wildlife and sensitive habitat preservation.

Safety:

Hazard with no existing side walk or 'Safe Walk to Schools' on Plato. Build the sidewalk first. (Reference Circ. Element Policy 3.3 & 3.8

POLICY 3.3: Create a safe and convenient circulation system for pedestrians. (Coastal Act/30252)

POLICY 3.8: A program shall be developed to install sidewalks or paths, where appropriate, around schools, churches, active parks, commercial and other areas of pedestrian activity where public safety or welfare is at issue (Coastal Act/30252)

Lights:

Restrict/Deny Patio String Lights, Big Screen TVs on Patio Rooftops. Maintain our "Dark Skies" community.

Low Income:

There are not enough low/very low income units proposed to address the city's need (though code compliant). How do Low/VL income owners afford to pay for HOA fees? What mechanism allows for fair selection of who gets to purchase/own here within the very low/low income buyers? Are they restricted from renting? Restricted as to how many non-blood related individuals can live within each unit? How do you ensure the low income buyers actually benefit from this project best?

Noise:

(Roof Top Patios) Limit 'After Hours' Parties; Create Deed Restrictions on Speakers/Boom boxes; I-5 noise levels hinder PP resident's quality of life. Adjacent neighbors hearing party noises late at night is bad.

Parking:

10 guest parking spaces are inadequate (though compliant to code, are still inadequate). Assure more parking spaces are created on-site. Make sure garage's square footage is enough for large SUV vehicles and garage storage space is adequate for multiple bikes, and other traditionally anticipated family stored items. Garages need to be much larger than proposed. If you allow only the 10 additional parking spaces, then create a policy (ordinance) to require larger garage square footage to allow for adequate storage). The Newton Laws are not going away just for this project.

Prohibit On-Street Parking:

There is no on-street parking on Piraeus & Plato. This creates a rare and unusual dilemma for the neighborhood. Though compliant to code, what can applicant do to add more on-site parking than currently proposed? There is not enough parking on-site. The recently modified parking ordinance was written (in my opinion) anticipating an assumed alternative for on-street parking nearby. Caudor St is too narrow and unsuited for PP's parking need overflow. Again, Newton's Laws are not going away just for this project.

Population and Housing:

Overpopulates the existing community. Project increases population of existing neighborhood by 30%. Capri School gets to capacity before PP even gets build, due to Fox Point, Clark, and other R-30 projects. Interiors appear cramped and units are too close together. How to improve PP residents 'quality of life' here? They have little space to live inside nor outside. What mechanism allows for fair selection of who gets to purchase/own here within the very low/low income buyers? Are they restricted from renting? Restricted as to how many non-blood related individuals can live within each unit? Studies demonstrate crime increase after high density project come into a neighborhood.

Growth Management

In a community that has experienced rapid development such as that which has occurred in Encinitas, it is important to establish measures to properly manage new growth. Premature development can strain a city's ability to provide essential services and infrastructure as well as adversely impacting the natural environment. The following goal and supporting policies underscore the City's resolve in ensuring that new development does not occur at the expense of the natural environment, existing development, or before adequate infrastructure and services are in place to accommodate any new development.

GOAL 2: The City should manage slow, orderly growth in accordance with a long-term plan which protects and enhances community values.

*Policy 2.1 Amended
3/13/19*

POLICY 2.1: Prepare, maintain, and periodically update public facility master plans that are based on adopted growth projections through coordination of appropriate city departments and agencies to anticipate the demand for services.

Public Services:

Project should be 'on hold' until a new elementary school get built to accommodate residents from all the R-30 projects in Leucadia? How can Planning allow such overdevelopment without providing adequate Public Services and resources? Where is the water coming from to service Piraeus Point, Goodson, Fox Point Farms, Sunshine Gardens, Vulcan, and the other R-30 projects as Colorado River water supply is currently being restricted? (Reference Land Use Policy 2.10 below.

POLICY 2.10: Development shall not be allowed prematurely, in that access, utilities, and services shall be available prior to allowing the development.
(Coastal Act/30252)

This should apply to schools as well. Capri Elementary will be over-capacity based on Fox Point, Clark, Sunshine Gardens, and other Leucadia R-30 projects.

Recreation:

Other than a swimming pool, there are no places for children to play on-site. No dog play area. Piraeus Point will be ... "...the only place in town with roof top yards."

Require Lennar to create open space green belts for child's play on site, families and seniors to sit on a bench with some open space. Is not Encinitas' all about "Quality of Life"! What can be done to require the project fit Encinitas's community character, not the other way around?

Safety:

Hazard with no existing side walk or 'Safe Walk to Schools' on Plato. Build the sidewalk first. (Reference Circ. Element Policy 3.3 & 3.8) As emergency shelters in the city are deemed as Public Schools (page 19 of Public Safety element) Capri Elementary was designed for a certain number of neighbors to serve. As Piraeus Point increases the neighboring population by approx. 20-30% that would use Capri as a shelter, how is the city/school district to provide an adequate safety shelter for the neighborhood? What of Fox Point's resident adding to the same need prior to PP?

Traffic and Transportation:

Project will negatively impact local streets and neighborhood. (Reference General Plan; Circulation Element Policy 2.2 & 2.3:

POLICY 2.3: Design the circulation system serving new development in such a way to minimize through traffic in all residential neighborhoods.

POLICY 2.4: When considering circulation patterns and standards, primary consideration will be given to the reservation of character and safety of existing residential neighborhoods. Where conflicts arise between convenience of motorists and neighborhood safety/community character preservation, the latter will have first priority.

Please Note in Policy 2.4, "Where conflicts arise between convenience of motorists and neighborhood safety/community character preservation, **the latter will have first priority.**"

Increased Project's traffic severely impacts local streets, especially during Capri School drop off & pick up times. Tasha Horvath stated in 2018 that "Capri School was going to 'fix' its congestion difficulty". The 'fix' has not happened yet, so what will be done to correct Capri School traffic issue prior to PP approvals? Council admitted there was a serious traffic difficulty. Regarding Capri School traffic, please see Policy 2.6 as Capri traffic is an ongoing, untenable bottleneck on-street parking lot for years.

POLICY 2.6: Periodically evaluate traffic circulation patterns of all roads in Encinitas. When was Capri Elementary traffic evaluated and what specific resolutions have been enacted since then?