

Analysis of Quail Meadows application for development Encinitas Residents for Responsible Development



VS



October 3, 2024

Quail Meadows inconsistent with Enc. General Plan + HCD guidelines for housing density

General Plan: Net acreage is the standard at city/state for density calcs

- This became an SB330 Project on July 2, 2020. State Law/Local regulations in effect apply to this application
- Land Use Policy 3.2 refers to the "net acreage" concept = **the total land area of a parcel is reduced by the area taken up by non-buildable areas.**
- HEU Appendix C, Table C-2, shows a **net acreage** of 9.04 acres based on known site factors that are unbuildable
- HEU Appendix C, p.6 shows NET ACREAGE CALCULATIONS low/very low RHNA sites
- June 10, 2020: HCD issued a memo on the Housing Element Site Inventory Guidebook Government Code Section 65583.2. "The capacity of a site should also be adjusted for areas that cannot be developed due to environmental factors such as hazards, wetlands, or topography that cannot be mitigated".
- Baldwin complicitly agreed to use the city's general plan in agreement with HCD for its R30 overlay approval.
- Quail Meadows application is inconsistent with the general plan +HCD guidelines

Quail Meadows is inconsistent with hillside/inland ordinance zone

- EMC 30.34.030A applies to all areas where site specific analysis indicates that 10% or more of a parcel exceeds 25%. Planning Commission is granted discretionary approvals for proposed development within hillside/inland ordinance zone.
- EMC 30.034.030B2 states: slopes greater than 25% shall be preserved in their natural state.
- Lot 2 slopes report states over 25% of Lot 2 is greater than 25%
- Slopes analysis does not comply with EMC that 2 foot contour intervals will be used in topographic maps. This application uses 5 ft contours.
- No historical aerial analysis of lot 2 is provided. Lot 2 steep slopes are natural walls of the inland creek/waterway. They are not modified nor disturbed. No engineering analysis or historical aerial is used to show manufactured slopes. The steep creek slopes exist today on Lot 2, under Building 2, are shown on the 2017 steep slopes topo.

Lot 2 step slopes should be protected from incursion and development and remain part of the local coastal creek that is a tributary to Moonlight Creek.

Quail Meadows is inconsistent with circulation element

- The traffic mitigation plan proposes changing signal timing measures + right turn on green arrow to decrease traffic delays on Quail Gardens Dr.
- The traffic mitigation measures proposed are generic.
- The traffic plan provided no traffic engineering simulations that the proposed mitigations will be effective.
- The mitigation measures did not model specific lane/traffic configurations/patterns on Quail Gardens Dr.
- Encinitas City does not control signal timing at I-5 freeway access.
- Caltrans controls signal timing. Has refused to release signal timing control to the city for last 15+ years.

Quail Meadows is inconsistent with the circulation element

- Caltrans controls signal timing at neighboring intersections along Encinitas Blvd,.
- CalTrans has refused to release signal timing control to the city for last 15+ years.
- Southbound Quail Gardens Dr. traffic backs up for over ¼ mile during mornings.
- QGD x Encinitas Blvd has room for 3 cars to stack up to turn right on the green arrow, this plan did not show how 3 cars released from traffic delays will affect the intersection LOS.
- The traffic plan doesn't demonstrate how the mitigation measures will reduce the impact of 2,500+ vehicle trips/day generated by this single site on the 2 lane QGD.

Increasing signal timing on southbound QGD to Westlake wont result in significant vehicle transit bc Westlake is gridlocked. Westlake southbound is controlled by a 4-waystop sign. This mitigation will not improve LOS. An analysis of the proposed traffic mitigation measures by a traffic engineering firm will be provided.

Public Health + Safety Vegetation plan inconsistent with SD County Soils removal plan

- SD County Department of Health/Quality soils remediation report stated there are Lead, Diesel fuel and pesticide contaminated soils on the QM site
- There are contaminated soils in the wetlands + conservation easement areas.
- CA Coastal Commission deemed the Wetlands, ESHA and protected species habitats to be protected and off limits to **any** incursions.
- Removal of plants (concrete pads?) in the wetlands buffer will disturb soils. **SD County SRM calls for no soil disturbance.**

Public Health and Safety Drainage plan is inconsistent with CA Coastal Commission

- City planner states that removal and replacement of failed 48” CMP in wetlands will occur so drainage plan of slipping the pipe in the wetlands can be done
- The slip-lining plan in drainage plan is inconsistent with agreement between Baldwin + CCC and USFW - that there will be **no incursion into the wetlands.**

Insufficient Drainage Plan



October 3, 2024 item 8B; Quail Meadows Apartments Project,
Case # MULTI-003751-2020; DR-003759-2020 & CDP-003761-
2020

- Project area contains a **seasonal creek** which **floods frequently**.
- Relies on **questionable existing infrastructure integrity** which has not been sufficiently assessed.
- Uses **outdated info** to model potential conditions at the site.
- Outdated information will result in **improper drainage planning**; inundated stormwater systems likely to fail as severe weather patterns become our new normal.
- Flooding and poor stormwater management has a **high potential for negative impacts to public safety**.
- Planning Commission should consider this plan as part of a greater mitigation and **cumulative impact strategy** rather than on a per-project basis.

In Summary

- Quail Meadows site has posed a threat to public health and safety from frequent and significant flooding.
- Development, especially high-density residential housing w/subterranean parking garages should **never be built in a flood zone.**
- Quail Meadows permits to build in a flood zone should be denied.
- The Baldwin site should never be permitted for development and should be reclassified as flood control in the city's land zoning.

Please keep the public safe -- Deny the permits for development!