

3.11 Recreation

3.11.1 Existing Conditions

3.11.1.1 Existing Parks and Recreational Facilities

The County Parks and Recreation Department provides parks and recreational opportunities for residents and visitors in the vicinity of the Project site. There are more than 48,000 acres of recreational facilities within the County including local and regional parks (active and passive), campgrounds, 350 miles of trails, fishing lakes, recreation centers and sports complexes, ecological preserves, and open space preserves. An NOP for the Project was released for public review on September 1, 2022 and an EIR Scoping Meeting was held on September 20, 2022. Four comment letters were received related to recreation. Ed Philbrick (received September 27, 2022) noted the current recreational uses of the existing open space on the Project site. Camille Perkins (received October 3, 2022) requested that the Project not include trails through Copper Creek and Rancho La Costa Preserve. Jay Petrek (received October 3, 2022) requested that the Project coordinate with the City of San Marcos to ensure future trail linkages. The City of San Marcos (received September 27, 2022) requested that the EIR address the recreational facilities on the Project site.

Additional nearby public parks are located within the City of San Marcos and the City of Carlsbad and include: San Elijo Park, located approximately 0.5 mile northeast of the Project site, which is developed with a trail connection, lighted ballfield and multi-purpose field, picnic area, splashpad area, restroom, tot lot and horseshoe court; Cadencia Park, which is located approximately 1.4 miles east of the Project site and is developed with open play grass area and a children's playground; and Stagecoach Community Park, located approximately 1.8 miles southwest of the Project site, which is developed an athletic field, basketball court, picnic facilities, gymnasium, sand lot, tennis court, restrooms, a tot lot and turf play area.

3.11.1.2 Regulatory Setting

Quimby Act

The Quimby Act of 1975 (California Government Code Section 66477, adopted 1975 and amended 1982), part of the Subdivision Map Act, requires developers seeking subdivision approvals to assist in mitigating the potential impacts resulting from improvements that may directly or indirectly increase the need for recreational facilities or park lands within a given city or county. In 1982, the Quimby Act was amended to allow local governments to be held accountable for imposing park development fees. The 1982 amendment to AB 1600 requires that agencies demonstrate a reasonable relationship between the public need for a recreational facility or park land and the development upon which the fee is being imposed. Cities and counties were required to show a strong direct relationship (or nexus) between park fees imposed and a proposed development. As a result, local ordinances are required to include specific standards for identifying the percentage of a subdivision to be dedicated and/or the relative fee that is required based on standards for local jurisdiction park lands. The Act establishes a maximum of 3 acres of park land dedication/fee per 1,000 residents unless the amount of existing neighborhood and community park land exceeds that limit (at the time of adoption). If the 3 acres per 1,000 residents

standard is exceeded, a greater standard of 5 acres per 1,000 residents may be adopted by the jurisdiction in order to meet anticipated park land needs.

County General Plan

The Project site is located within the boundaries of the San Diego County General Plan. The Land Use Element (Chapter 3) and the Conservation and Open Space Element (Chapter 5) of the General Plan provide background information, policies, and measures aimed at the acquisition, provision, and maintenance of public recreational resources within San Diego County. Goals and policies given in the Land Use Element (LU-Chapter 7) and Conservation and Open Space Element (COS Chapter 5) of the General Plan are applicable to the Project with regard to recreation and are each addressed in Section 3.1.6 5 of this EIR. The General Plan contains additional policies, goals, and implementation measures that are more general in nature and not specific to development such as the Project.

Goal COS-21: Park and Recreational Facilities states that park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County. Per the County General Plan EIR (County 2011a), the current estimated population for the unincorporated County area is 678,270; therefore, the General Plan requirement would be satisfied by approximately 6,780 acres of local park land and 10,170 acres of regional parkland. (County Park demand increases as the County residential population increases.)

Zoning Ordinance Section 4900 – Usable Open Space Regulation

These regulations promote the availability of outdoor areas for leisure and recreation throughout San Diego County by establishing requirements for minimum areas of usable open space for residential developments with three or more dwelling units per lot or building site. The provisions for usable open space include standards for surfacing, location, size and shape, accessibility, openness, screening, and maintenance of the required usable open space.

Community Trails Master Plan (Subdivision Ordinance Sec. 81.706.1 through 81.707 and Regulatory Code Sect 812.201 et. seq.)

The Board of Supervisors adopted the County Trails Program (CTP) on January 12, 2005, and incorporated the CTP into the General Plan. The CTP has various components, including the Community Trails Master Plan (CTMP). The CTMP contains the 22 individual community trail and pathway maps. The Project is located in the San Dieguito area.

A number of existing and proposed community trails are located along public rights-of-way and over private property in the vicinity of, or on, the Project site, consistent with the CTMP (County 2009). These facilities are designed to be located in close proximity to residents, and to provide transportation, recreation, access, infrastructure, linkages and safe routes throughout a community. North of the Project site along the southern side of San Elijo Road is the existing Copper Creek Trail located in the

City of San Marcos. Additionally, along the northern side of San Elijo Road north of the Project site, is the existing Quarry Trail also located in the City of San Marcos.

County of San Diego Park Land Dedication Ordinance

Section 66477 of the Government Code enables local governments to require the dedication of land or the payment of an in-lieu fee, or a combination of both, for neighborhood and community park or recreational purposes. The Park Land Dedication Ordinance (PLDO) (County Code sections 810.101 through 810.114) provides the mechanism for implementing Section 66477 of the Government Code in San Diego County. It is the intent of this ordinance to ensure the construction of recreational facilities to adequately serve the residents of the County as well as ensure consistency with the Quimby Act.

The Project would be subject to the requirements of the PLDO, for the San Dieguito Local Park Planning Area (LPPA), which specifies a minimum of 373.74 s.f. of park space per each residential dwelling unit (DU) for developments of 50 DUs or more. The PLDO establishes several methods by which developers may satisfy their park requirements. Options include the payment of park fees, the dedication of a park land, or a combination of these methods. PLDO funds from payment of in-lieu fees must be used for the acquisition, planning, and development of local parkland and recreation facilities. Up to 50 percent of the total acreage of private active recreation areas provided by a development may be used to satisfy up to 50 percent of the PLDO public park land requirement for a development. The balance of the PLDO requirement would need to be satisfied by payment in-lieu if the combination of public and private acreage does not satisfy the requirement.

All PLDO-required parks must be large enough and physically suitable to accommodate amenities typically associated with neighborhood parks and “active recreational uses” as defined in Section 810.102(a) of the PLDO. They must provide adequate off-street parking, restroom facilities, maintenance facilities, and other infrastructure such as utility connections and storm water drainage. Parking lots, retention/detention basins and slopes do not count toward the PLDO acreage requirements.

All park sites must be fully developed to comply with PLDO dedication requirements and require identification of ownership and maintenance responsibilities and related funding mechanisms. Park design and amenities must reflect County development standards.

3.11.2 Analysis of Project Effects and Determinations as to Significance

Guidelines for the Determination of Significance

A significant impact to recreation would occur if the Project would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Guidelines Source

The identified guidelines are based on Appendix G of the CEQA Guidelines.

Analysis

The development of a private park and a trail connection and privately maintained parking spaces for trail access are components of the Project's design. One private park totaling 0.31-acre is planned as part of the Project and would be operated and maintained by the Project's Homeowners Association (HOA). In addition, the Project includes approximately 64 acres of open space. A 10-foot-wide public trail made of decomposed granite is proposed along the eastern boundary of the development area which would connect to the existing portion of the Copper Creek Trail located along southeastern boundary of the Project site (refer to EIR Figure 1-1). Public trail easements would be dedicated to the County. Note that the Project's trail would be open to the public, however the associated acreage would not be counted towards PLDO requirements.

Park Land Dedication Ordinance Compliance

The Project entails the proposed development of 76 residential homes and would be subject to the requirements of the PLDO, as amended, for the San Dieguito LPPA. This ordinance specifies a minimum of 360.68 s.f. of park space per dwelling unit. This would require that the Project provide approximately 0.63 acre of parkland for the use and benefit of members of the public and future Project residents within an effective service radius (considered to be a maximum of 0.25 mile for pocket parks, and a maximum of 0.5 mile for neighborhood parks).

To fulfill the requirements of the PLDO, the Project includes 0.31 acre of private parkland within the Project site. Because private park acreage totals are calculated at 50 percent for purposes of PLDO satisfaction, an additional 0.47 acre of parkland would be required to meet the required 0.63 acre of parkland. The remaining PLDO requirement would be satisfied through the payment of in lieu fees.

With the provision of the new parks and recreational facilities to serve the Project and the public, combined with the additional PLDO payment, the Project would not increase the use of existing neighborhood parks, regional parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated.

With regard to the second threshold, the new recreational facilities constitute Project features that are analyzed as part of the Project's physical disturbance footprint throughout this EIR. As discussed in Chapter 2.0 of this EIR, the "footprint" impacts associated with Project features, including new recreational facilities, would be mitigated as warranted. The Project's proposed recreational facilities are inherent components of the Project's design and would not result in construction activities beyond those that are already proposed as part of the overall Project. The proposed on-site facilities would serve Project residents. The on-site trail segment would also be available to the general public, but it is not reasonably foreseeable that substantial additional vehicle traffic and associated vehicle-related effects would be created due to public use of the trail segment, as the trail would be connected to the

existing Copper Creek Trail that is already being used by the public. It is expected that the Project's trail would provide opportunities for longer trail length and not necessarily draw substantially more people to the trail than are already using the Copper Creek Trail. Therefore, the new recreational facilities would not have an adverse physical effect on the environment beyond the construction effects that are an inherent part of the Project's design and discussed throughout this EIR.

Taking all of the above into consideration, recreation demands generated by the Project would be satisfied through the inclusion of on-site private recreational facilities, and payment of PLDO fees. Impacts to recreation would be less than significant.

3.11.3 Cumulative Impact Analysis

Several related cumulative development projects have been recently completed or are planned for development in the vicinity of the Project, as listed in Table 1-3, *List of Cumulative Development Projects*. These future projects include residential developments totaling approximately 450 dwelling units, as well as other types of development, such as medical office, senior living, student living, commercial, office space, and others. Cumulative impacts to recreation of these development projects are discussed below. The significance guidelines used to evaluate Project-specific impacts, described above in Section 3.12.2, also are applicable here.

Regarding use of existing parks, it was determined that implementation of the Project would not have a significant impact on parks and recreational facilities because it would conform to the PLDO, as do other projects in the County. Similar to the Project, the cumulative projects would be required to comply with the PLDO in proportion to their potential impact on the demand for parks and recreational facilities, as required by the County (or similar requirements of other corresponding jurisdictions). Since compliance with the PLDO would be required prior to granting of building permits for all cumulative projects approved by area lead agencies, and a number of compliance avenues exist (e.g., payment of park fees, the dedication of park land, or a combination of these methods), the cumulative projects would provide for an adequate amount of recreational space not increase the use of existing neighborhood parks, regional parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. No cumulative regional impact would occur. As noted above, the Project contribution to any regional effect also would be addressed through design and PLDO consistency. Resulting contributions to the less than significant cumulative effect would be less than considerable, and therefore less than significant.

The adverse impacts of any new or expanded recreational facility required for the cumulative projects would be location specific and associated with the companion development, and impacts would be analyzed and addressed separately in a project-level CEQA analysis. The Project's new recreational facilities would not result in cumulatively considerable environmental effects or contribute to a cumulative recreational impact.

As a result, cumulative recreation impacts would be less than significant.

3.11.4 Significance of Impacts Prior to Mitigation

Based on the analysis provided above, the Project would have less-than-significant impacts related to recreation.

3.11.5 Conclusion

Based on the analysis provided above, less-than-significant direct and cumulative impacts related to recreation would result from implementation of the Project.