

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
619-737-2370

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July 17, 2002

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TO: COMMISSIONERS AND INTERESTED PERSONS

**FROM: DEBORAH LEE, SOUTH COAST DEPUTY DIRECTOR
SHERILYN SARB, DISTRICT MANAGER, SAN DIEGO
KERI AKERS, COASTAL PROGRAM ANALYST**

**SUBJECT: STAFF RECOMMENDATION ON CITY OF CARLSBAD MAJOR
AMENDMENTS NO. 1-2002D (Thompson-Tabata) (For Commission
Consideration and Possible Action at the Meeting of August 6-9, 2002)**

SYNOPSIS**SUMMARY OF AMENDMENT REQUEST**

The subject amendment request revises the certified Carlsbad LCP Mello II Implementation Program. The request rezones an 82.2-acre site (Thompson-Tabata) from Limited Control (L-C) to One Family Residential (R-1) and Residential Density Multiple (RD/M). On April 22, 2002, the City of Carlsbad's proposed Local Coastal Program Amendment (LCPA) 1-2002 was received in the San Diego District office. The amendment package contained three other requests to amend the certified Carlsbad LCP implementation program which have received Commission action. A time extension of up to one year was granted by the Commission at the June 2002 meeting. The Thompson-Tabata amendment is going forward at the August 2002 hearing at the request of the City of Carlsbad.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending denial of the proposed LCP amendment as submitted, and subsequent approval if modified. The rezone is consistent with the land use designation in the certified Mello II Land Use Plan (LUP) in that it would not allow a greater density on the site than the certified Residential Low Medium (RLM 0-4 dua) and Residential Medium (RM) land use designations would allow.

The Thompson-Tabata site is largely flat or gently sloped, with approximately 7.59 acres containing slopes greater than 25%. The majority of the site has been previously cleared for agriculture. Approximately 1.8 acres of coastal sage scrub (CSS) on steep slopes are located in a narrow strip along the eastern boundary of the site. A riparian area of southern willow scrub (SWS) totalling approximately 0.1 acre is located on the western boundary of the site.

The purpose of the L-C zone is to provide an interim zone for areas where planning for future land uses has not been completed, or plans for development have not been formalized. A number of L-C properties, which were formerly used for agriculture but are now becoming ready for development, exist within the coastal zone; several are included in the Carlsbad draft Habitat Management Plan (HMP) as "hardline" and "standards" properties. Although it is anticipated that the L-C properties will be developed at urban intensities, the Mello II land use plan (LUP), which was originally certified in 1981, does not address this zoning designation or the projected urban transition and development of the L-C properties. In order to avoid piecemeal conversion of these properties from agriculture to urban uses, staff has recommended that the City should revise the LCP to address the L-C properties and provide a comprehensive plan for their development. Such an LCP amendment would take into account the cumulative impacts of these land use conversions on existing sensitive resources and current traffic patterns, and address resource protection requirements based on site specific conditions.

Additionally, the LCP, which was certified in 1981, has not been updated to adequately protect environmentally sensitive habitat area (ESHA) and species such as the gnatcatcher, which has been listed since the LCP's certification. The LCP protects sensitive native vegetation on steep slopes (>25%), but does not protect native vegetation in flatter areas. The dual-criteria slope policy preserves natural landforms and prevents erosion, but does not address the need to preserve rare native plant communities, especially those which have been determined by federal or state listing to be threatened or endangered. The gnatcatcher, which resides in the CSS community, was listed as threatened by the USFWS in 1993, and several species within the southern maritime chaparral community were listed as threatened or endangered in 1996. Currently, over 200 plant and animal species in the San Diego region are listed or proposed to be listed by federal or state governments as endangered, threatened, or rare. The LCP does not include policies specifying how development in the L-C zone will be comprehensively planned in a manner consistent with the ESHA protection requirements of Section 30240 of the Coastal Act.

When the LCP was certified, it was anticipated that the purpose of the L-C zone was to provide an interim zone for areas not yet ready for development and where plans for development had not been formalized. This purpose is stated in Section 21.39.010 of the City's zoning code (Title 21). This planning has not yet taken place. The City has submitted several LCP amendments to rezone individual L-C properties, based on individual site plans, but has not submitted an LCP amendment to revise and update the LUP and/or provide a comprehensive plan for the L-C zoned properties as a whole. The City has stated that it intends to provide a comprehensive update of the LCP in future, to address the HMP and other outstanding concerns. When the LCP is updated, a provision will be incorporated to require those areas that have been placed under open space easements for the purpose of habitat conservation, to be turned over to the management of an appropriate conservation agency with responsibility for the overall HMP preserve system.

These unresolved issues make it difficult to conclude that an amendment to the implementation plan of the LCP is sufficient to address the underlying deficiencies of the

LCP, which affect not only this individual site but all of the undeveloped properties within the coastal zone. These deficiencies and the out-of-date scope of the plan make it necessary for the City of Carlsbad to update and revise its plan to reflect current requirements for habitat and species protection, and to provide coordinated and comprehensive planning for the transition of agricultural lands, instead of addressing these areas solely through site-specific, individual rezones. However, in the absence of an LCP update, in consideration of the proposed rezone, the Commission must consider the development pattern of these L-C zoned properties that will be enabled by the proposed rezone and establish development standards applicable to future development which include the resource protection standards lacking in the current LCP.

Staff is recommending that the City amend the proposed rezone through suggested modifications that will incorporate development standards specific to the subject site and applicable to future development of the site onto the certified LCP zoning map. A condition of approval of the LCP amendment by the City acknowledges potential revisions must be submitted to the Planning Department and may require an amendment to the approval by the City. The modifications would prohibit disturbance of the on-site coastal sage scrub and riparian areas and provide buffers adjacent to the habitat areas. The standards require the buffers to be revegetated with native, non-invasive species and address brush management activities, noise and lighting permitted adjacent to the buffer zones. The standards also permanently restrict the allowable uses in both the habitat and buffer areas to ensure habitat protection through a conservation easement. Approval of the proposed rezone with these suggested modifications is consistent with Section 30240 of the Coastal Act and the draft HMP and will not jeopardize creation of a viable open space preserve system.

The appropriate resolutions and motions can be found on Page 5. The findings for approval of the amendment can be found on Page 11.

BACKGROUND

Carlsbad Local Coastal Program (LCP)

The City's certified LCP contains six geographic segments as follows: Agua Hedionda, Mello I, Mello II, West Batiquitos Lagoon/Sammis Properties, East Batiquitos Lagoon/Hunt Properties and Village Redevelopment. Pursuant to Sections 30170(f) and 30171 of the Public Resources Code, the Coastal Commission prepared and approved two portions of the LCP, the Mello I and II segments in 1980 and 1981, respectively. The West Batiquitos Lagoon/ Sammis Properties segment was certified in 1985. The East Batiquitos Lagoon/Hunt Properties segment was certified in 1988. The Village Redevelopment Area LCP was certified in 1988; the City has been issuing coastal development permits there since that time. On October 21, 1997, the City assumed permit jurisdiction and has been issuing coastal development permits for all of its segments except Agua Hedionda. The Agua Hedionda Lagoon LCP segment remains as a deferred certification area until an implementation plan is certified. The subject amendment request affects the Zone 20 Specific Plan of the LCP's Mello II segment.

Carlsbad Habitat Management Plan (HMP)

The Carlsbad HMP is being prepared to satisfy the requirements of a federal Habitat Conservation Plan (HCP), and as a subarea plan of the regional Multiple Habitat Conservation Plan (MHCP). The MHCP study area involves approximately 186 square miles in northwestern San Diego County. This area includes the coastal cities of Carlsbad, Encinitas, Solana Beach and Oceanside, as well as the inland cities of Vista and San Marcos and several independent special districts. The participating local governments and other entities will implement their portions of the MHCP through individual subarea plans such as the Carlsbad HMP. Once approved, the MHCP and its subarea plans will replace interim restrictions placed by the U.S. Fish and Wildlife Services (USFWS) and the California Department of Fish and Game (CDFG) on impacts to coastal sage scrub and gnatcatchers within that geographical area, and will allow the incidental take of the gnatcatcher and other covered species as specified in the plan.

ADDITIONAL INFORMATION

Further information on the submittal may be obtained from Keri Akers at the San Diego Area Office of the Coastal Commission at 7575 Metropolitan Drive, Suite 103, San Diego, CA 92108-4402, (619) 767-2370.

PART I. OVERVIEW**A. STANDARD OF REVIEW**

The standard of review for LCP implementation plan submittals or amendments is their consistency with and ability to carry out the provisions of the certified LUP. Pursuant to Section 30513 of the Coastal Act, the Commission may only reject zoning ordinances or other implementing actions, as well as their amendments, on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. The Commission shall take action by a majority vote of the Commissioners present.

B. PUBLIC PARTICIPATION

The City has held both Planning Commission and City Council hearings with regard to the subject amendment request. The local hearings were duly noticed to the public. Notice of the subject amendment has been distributed to all known interested parties.

PART II. LOCAL COASTAL PROGRAM SUBMITTAL - RESOLUTIONS

Following a public hearing, staff recommends the Commission adopt the following resolution and findings. The appropriate motion to introduce the resolution and a staff recommendation are provided just prior to the resolution.

Implementation Plan Denial as Submitted:

- I. **MOTION:** *I move that the Commission reject the Implementation Program Amendment #1-2002D for the City of Carlsbad as submitted.*

STAFF RECOMMENDATION OF CERTIFICATION AS SUBMITTED:

Staff recommends a YES vote. Passage of this motion will result in rejection of the Implementation Program Amendment and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

RESOLUTION TO DENY IMPLEMENTATION PROGRAM AMENDMENT AS SUBMITTED:

The Commission hereby denies certification of the Implementation Program submitted for the City of Carlsbad and adopts the findings set forth below on grounds that the Implementation Program as submitted does not conform with and is inadequate to carry out the provisions of the certified Land Use Plan (LUP). Certification of the Implementation Program would not meet the requirements of the California Environmental Quality Act, as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the Implementation Plan as submitted.

Implementation Plan Certification with Suggested Modifications:

- II. **MOTION:** *I move that the Commission certify the Implementation Program Amendment #1-2002D for the City of Carlsbad if modified as suggested in this staff report.*

STAFF RECOMMENDATION:

Staff recommends a YES vote. Passage of this motion will result in certification of the Implementation Program with suggested modifications and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

RESOLUTION TO CERTIFY THE IMPLEMENTATION PROGRAM WITH SUGGESTED MODIFICATIONS:

The Commission hereby certifies the Implementation Program Amendment for the City of Carlsbad and adopts the findings set forth on grounds that the Implementation Program with the suggested modifications conforms with and is adequate to carry out the provisions of the certified Land Use Plan. Certification of the Implementation Program if modified as suggested complies with the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Program on the environment, or 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment.

SUGGESTED MODIFICATION:

Staff recommends that the following modifications to the proposed LCP amendment be adopted. The underlined sections represent language that the Commission suggests be added:

1. The City shall incorporate the following requirements onto the certified LCP Zoning Map, to apply to the subject parcels (APN # 214-140-44, 214-170-09, -36, -58, -59, -73, -77):
 - a. The onsite areas of native vegetated habitat (approximately 2 acres), including coastal sage scrub, southern willow scrub and riparian area, shall be protected as a condition of development approval, and secured through recordation of an open space conservation easement in favor of the City of Carlsbad or other conservation agency, or through other appropriate preservation method. Use of the open space areas containing native vegetated habitat shall be restricted to habitat conservation, restoration and enhancement, and operation and maintenance of existing storm water facilities in the riparian area as necessary to serve existing and future development.

- b. As a condition of development approval, the onsite coastal sage scrub shall be protected by a buffer which shall include the slope upland of the habitat and a six foot high, solid barrier wall permanently located at the top of the slope, to separate the coastal sage scrub from the adjacent residential development. No gates, openings or access to the habitat shall be provided through the barrier wall from the residential lot to the open space; however, the upper two feet of the wall may be plexiglass. The wall and its function as a habitat protection barrier shall be maintained by the Home Owners Association. All brush management for fire protection shall occur on the residential side of the habitat barrier wall. No clearing of the coastal sage scrub habitat shall be permitted. The buffer area shall be secured through an easement or deed restriction that prohibits structures, grading and/or non-native plantings in the habitat buffer area. Revegetation of the disturbed area adjacent to the wall shall occur utilizing native, non-invasive species to reduce erosion potential, enhance habitat value and to screen the wall from views toward the residential development from the east. The development shall direct controllable noise and light sources away from the habitat areas and, if plexiglass is utilized, no lighting shall be permitted within 20 feet of the barrier wall.
- c. As a condition of development approval, the onsite areas of southern willow scrub, riparian and wetland area shall be protected by a minimum 50-foot buffer area, to the extent that the buffer can be physically accommodated on the subject site. Where the distance between the riparian area and existing adjacent development to the west is less than 50 feet, the buffer shall be provided to the maximum extent feasible. Remedial grading activities are allowed within the buffer area to the minimum extent necessary to stabilize adjacent soil conditions for safety and environmental protection purposes. The buffer area shall be secured through an easement or deed restriction that prohibits structures and/or non-native plantings in the habitat buffer area. The buffer surrounding the riparian habitat shall be enhanced through planting native vegetation determined in consultation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service. Brush management for fire protection is not allowed in the buffer area. Passive recreational uses such as sidewalks and seating areas are allowable in the upper half of the buffer zone.

PART IV. FINDINGS FOR DENIAL OF THE CITY OF CARLSBAD MELLO II IMPLEMENTATION PLAN (THOMPSON-TABATA REZONE), AS SUBMITTED AND APPROVAL IF MODIFIED AS RECOMMENDED

A. AMENDMENT DESCRIPTIONS

The amendment changes the Carlsbad LCP implementation plan by rezoning a 82.2-acre parcel (Thompson-Tabata) from Limited Control (L-C) to One Family Residential (R-1) and Residential Density Multiple (RD/M). The amendment is associated with a specific project proposal that has been approved by the City to allow 238 single-family homes, a 24-unit condominium project, and associated amenities.

The Thompson-Tabata site contains approximately 1.8 acres of coastal sage scrub (CSS) on steep slopes located in a narrow strip along the eastern boundary of the site, and a riparian area of southern willow scrub (SWS) totalling approximately 0.1 acre located on the western boundary of the site. In the approved permits, all of the coastal sage scrub area is proposed to remain undisturbed and will be preserved as open space through an open space easement. The preserved habitat will become part of the Zone 20 habitat corridor proposed in the City's draft Habitat Management Plan (HMP). The City approval accepted mitigation for the removal of the 0.1 acre of riparian vegetation; however, the property owner has submitted a revised tentative map which indicates retention of all area delineated as wetland pursuant to the Coastal Act and provision of a 50 ft. buffer, where possible. The location of existing development and drainage structures preclude the ability to provide a full 50 ft. buffer on the western and eastern sides of the habitat. However, disturbance in the buffer zones will be minimized and disturbed area revegetated with native, non-invasive species and secured as open space.

The Thompson-Tabata site lies on the west side of Aviara Parkway. When the east-west extension of Poinsettia Lane is constructed through the property, approximately 11 acres of the site will be located north of Poinsettia Lane and the remainder will be located to the south. Access to the property will be from an existing intersection of Poinsettia Lane and Rose Drive. Four existing local streets (Lemon Leaf Drive, Lonicera Street, Alyssum Road, Rose Drive) will also be extended onto the project site for local circulation and access. Adjacent development and land uses consist of single-family development to the south, the Aviara Planning Area 25 open space and single-family development to the east, a single-family subdivision to the north, and multi-family and single-family subdivisions to the west. Topographically, the site is largely flat or gently rolling except for manufactured slopes on the northern boundaries associated with the development of Poinsettia Lane, and the 1.8 acre area of coastal sage scrub. Development will be sited in existing disturbed areas and native habitat areas will be preserved as open space.

B. PURPOSE AND INTENT OF THE ORDINANCE

The purpose and intent of the R-1 zone (One-Family Residential Zone) is to allow for single family detached homes and associated structures. The RD/M (Residential Density Multiple) zone designation allows for townhouses, condominium and apartments, and small-lot single family attached and detached homes. The L-C zone designation is given to annexed properties and is an interim zone for areas where planning for future land uses has not been completed or plans of development have not been formalized. The proposed R-1 zone is also compatible with the existing adjacent residentially zoned properties and probable future residential zones of the adjacent L-C zoned properties.

C. MAJOR PROVISIONS OF THE ORDINANCE

The amendment provides for the change of zoning of the Thompson-Tabata site from L-C to R-1 and RD/M. The property is designated in the certified Mello II Land Use Plan as Residential Low Medium (0-4 dua). The R-1 zone allows single-family residential housing and associated amenities, sets a 35 foot height limit, establishes development

standards for setbacks and placement of buildings, and provides other standards for construction design and exterior appearance. The RD-M/Q zone allows multi-family residential housing and associated amenities, sets a 14' 1" height limit, and establishes development standards for setbacks, placement of buildings and minimum lot area. Additional development standards for this zone include provisions for minimum distance between buildings and minimum parking requirements for residents and guests. If the rezone is approved, the certified LCP requires the proposed development to obtain site development plans and coastal development permits from the City Planning Commission prior to building permit issuance.

Chapter 21.39 of the City's zoning code provides, in part, the following requirements for L-C zoning:

21.39.10 Intent and Purpose

The intent and purpose of the L-C zone is to provide an interim zone for areas where planning for future land uses has not been completed or plans for development have not been formalized. After proper planning or plan approval has been completed, property zoned L-C may be rezoned in accord with this title.

D. ADEQUACY OF ORDINANCE TO IMPLEMENT THE CERTIFIED LUP/DENIAL AS SUBMITTED

The standard of review for LCP implementation submittals or amendments is their consistency with and ability to carry out the provisions of the certified Land Use Plan (LUP). In the case of the subject LCP amendment, the City's Municipal Code serves as the Implementation Program for the Mello II segment of the LCP.

The following resource protection policies are contained in the certified Mello II LUP:

Policy 3-7 states:

Wetlands and riparian resources outside the lagoon ecosystems shall be protected and preserved. No direct impacts may be allowed except for the expansion of existing circulation element roads identified in the certified LCP and those direct impacts associated with the installation of utilities (i.e. water, sewer, and electrical lines). There must be no feasible less environmentally-damaging alternative to the proposed disturbance; any allowable disturbance must be performed in the least environmentally damaging manner. Open space dedication of sensitive resource areas is required.

Mitigation ratios for any temporary disturbance or permanent displacement of identified resources shall be determined in consultation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service. Appropriate mitigation ratios shall be determined based on site specific information. Such information shall include, but is not limited to, the type and

size of the development and or proposed mitigations (such as planting of vegetation or the construction of fencing) which will also achieve the purposes of the buffer. The buffer shall be measured landward from the delineated resource. The California Department of Fish and Game and the United States Fish and Wildlife Service shall be consulted in such buffer determinations. Buffer zones shall be protected through the execution of open space easements and passive recreational uses are restricted to the upper half of the buffer zone.

Policy 3-8 states:

Buffer zones of 100 feet in width shall be maintained around all identified wetland areas and 50 feet in width shall be maintained around all identified riparian areas, unless the applicant demonstrates that a buffer of lesser width will protect the identified resources, based on site specific information. Such information shall include, but is not limited to, the type and size of the development and/or proposed mitigation (such as planting of vegetation or the construction of fencing) which will also achieve the purposes of the buffer. The buffer shall be measured landward from the delineated resource. The California Department of Fish and Game and the United States Fish and Wildlife Service shall be consulted in such buffer determinations. Buffer zones shall be protected through the execution of open space easements and passive recreational uses are restricted to the upper half of the buffer zone.

Policy 4-3 of the certified Mello II LUP states, in part:

(b) All Other Areas

Any development proposal that affects steep slopes (25% inclination or greater) shall be required to prepare a slope map and analysis for the affected slopes. Steep slopes are identified on the PRC Toups maps. The slope mapping and analysis shall be prepared during CEQA environmental review on a project-by-project basis and shall be required as a condition of a coastal development permit.

- (1) Slopes Possessing Endangered Species and/or Coastal Sage Scrub and Chaparral Plant communities: For those slopes mapped as possessing endangered plant/animal species and/or coastal sage scrub and chaparral plant communities, the following policy language applies:

- (a) Slopes of 25% grade and over shall be preserved in their natural state unless the application of this policy would preclude any reasonable use of the property, in which case an encroachment not to exceed 10% of the steep slope area over 25% grade may be permitted. For existing legal parcels, with all or nearly all of their area in slope area over 25% grade, encroachment may be permitted; however, any such encroachment shall be limited so that at no time is more than 20% of the entire parcel (including areas under 25% slope) permitted to be disturbed from its natural state. This policy shall not apply to

the construction of roads of the City's Circulation Element or the development of utility systems. Use of slopes over 25% may be made in order to provide access to flatter areas if there is no less environmentally damaging alternative available.

The land use designation in the Mello II LUP designates the site as Residential Low Medium (RLM) and Residential Medium (RM). The RLM designation allows single-family residential development at a range from zero to four dwelling units per acre (dua), and the RM designation allows single-family and multi-family development at a range from zero to eight dua. The Residential Low Medium designation is on the eastern half of the site, totalling approximately 41.79 acres, and the Residential Medium designation is on the western half of the site, totalling approximately 40.41 acres.

The proposed zoning and development proposal for the Thompson-Tabata site would result in a residential density of 3.2 dua on the portion of the property designated RLM, and 6.0 dua on the portion designated RM. The property is bordered to the north by the Seaside Heights and Roesch single-family developments, to the east by vacant land, and to the south by Poinsettia Lane and the Aviara development, with Aviara Parkway to the west. The property is bordered by single-family and multi-family residential development and open space. The residential densities are consistent with the land use designation in the certified LUP. The Commission finds the proposed zoning designations are consistent with the certified LUP land use designation and the zoning of surrounding properties.

The property contains areas of steep slopes (25%+) and/or native vegetation, 1.8 acres of coastal sage scrub vegetation and approx. 0.1 acre of southern willow scrub (SWS) riparian vegetation. Although gnatcatchers have not been found to occur on the Thompson-Tabata site, the onsite areas of coastal sage scrub (CSS) may provide foraging habitat. Commission staff has determined that the CSS and SWS contained onsite meet the criteria for environmentally sensitive habitat area (ESHA). Pursuant to Section 30240 of the Coastal Act, ESHA shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed in those areas. The certified LUP allows up to 10% encroachment into sensitive vegetation on steep slopes and does not provide for the protection of vegetation on non-steep areas. The LUP also prohibits disturbance to wetland and riparian resources outside the lagoon ecosystems such as those contained on the subject site. In any event, the Commission must address protection of ESHA and other coastal resources where these resources are found consistent with current laws which protect threatened or endangered species.

The purpose of the L-C zone is to provide an interim zone for areas where planning for future land uses has not been completed, or plans for development have not been formalized. A number of L-C properties, which were formerly used for agriculture but are now becoming ready for development, exist within the coastal zone; several are included in the Carlsbad draft HMP as hardline and standards properties. Although it is anticipated that the L-C properties will be developed at urban intensities, the Mello II land use plan (LUP), which was originally certified in 1981, does not address this zoning designation or the projected urban transition and development of the L-C properties. In order to avoid piecemeal conversion of these properties from agriculture to urban uses,

staff has recommended that the City should revise the LCP to address the L-C properties and provide a comprehensive plan for their development. Such an LCP amendment would take into account the cumulative impacts of these land use conversions on existing sensitive resources and current traffic patterns, and address resource protection requirements based on site specific conditions.

Additionally, the LCP, which was certified in 1981, has not been updated to adequately protect environmentally sensitive habitat area (ESHA) and species such as the gnatcatcher, which has been listed since the LCP's certification. The LCP protects sensitive native vegetation on steep slopes (>25%), but does not protect native vegetation in flatter areas. It also does not contain specific buffer requirements for development adjacent to upland sensitive habitat areas. The dual-criteria slope policy preserves natural landforms and prevents erosion, but does not address the need to preserve rare native plant communities, especially those which have been determined by federal or state listing to be threatened or endangered. The gnatcatcher, which resides in the CSS community, was listed as threatened by the USFWS in 1993, and several species within the southern maritime chaparral community were listed as threatened or endangered in 1996. Currently, over 200 plant and animal species in the San Diego region are listed or proposed to be listed by federal or state governments as endangered, threatened, or rare. The LCP does not include policies specifying how development in the L-C zone will be comprehensively planned in a manner consistent with current laws protecting rare and endangered species and the ESHA protection requirements of Section 30240 of the Coastal Act.

When the LCP was certified, it was anticipated that the purpose of the L-C zone was to provide an interim zone for areas not yet ready for development and where plans for development had not been formalized. This purpose is stated in Section 21.39.010 of the City's zoning code (Title 21). This planning has not yet taken place. The City has submitted several LCP amendments to rezone individual L-C properties, based on individual site plans, but has not submitted an LCP amendment to revise and update the LUP and/or provide a comprehensive plan for the L-C zoned properties as a whole. The City has stated that it intends to provide a comprehensive update of the LCP in future, to address the HMP and other outstanding concerns. When the LCP is updated, a provision will be incorporated to require those areas that have been placed under open space easements for the purpose of habitat conservation, to be turned over to the management of an appropriate conservation agency with responsibility for the overall HMP preserve system.

These unresolved issues make it difficult to conclude that the proposed amendment to rezone and enable a single property for residential development is sufficient to address the underlying deficiencies of the LCP, which affect not only this individual site but all of the undeveloped properties within the coastal zone. These deficiencies and the out-of-date scope of the plan make it necessary for the City of Carlsbad to update and revise its plan to reflect current requirements for habitat and species protection, and to provide coordinated and comprehensive planning for the transition of agricultural lands, instead of addressing these areas solely through site-specific, individual rezones. However, in the absence of an LCP update, in consideration of the proposed rezone, the Commission must consider the development pattern of these L-C zoned properties that will be enabled

by the proposed rezone and establish development standards applicable to future development which include the resource protection standards lacking in the current LCP.

In this particular case, the City has approved a 238 unit residential development on the subject site and has accepted mitigation for removal of the riparian vegetation, although the area is to be retained as passive recreational use in an open space lot. The coastal sage scrub habitat is preserved as open space through an open space easement to be maintained by the Homeowner's Association. The property owner is willing to incorporate changes into the plan to preserve the riparian area and establish buffer zones adjacent to the coastal sage scrub habitat consistent with the policies of the certified LUP. Such modifications would also address the deficiencies in the current LCP with regard to upland habitat buffers.

However, as submitted, the Commission finds that the proposed rezone does not acknowledge the open space potential of the sensitive habitat areas on the subject site, or contain policy standards for future development of the site which will adequately protect the habitat value consistent with the requirements of the LUP as interpreted in light of Section 30240 of the Coastal Act. Therefore, the LCP amendment, as submitted, must be denied.

E. FINDINGS FOR APPROVAL, IF MODIFIED

1. Habitat Protection

The standard of review for LCP implementation submittals or amendments is their consistency with and ability to carry out the provisions of the certified Land Use Plan (LUP). In the case of the subject LCP amendment, the City's Municipal Code serves as the Implementation Program for the Mello II segment of the certified Carlsbad LCP.

The Thompson-Tabata site is located within the Mello II land use planning area and is currently zoned L-C. The site was formerly used for agriculture. The purpose of the L-C zone is to provide an interim zone for areas where planning for future land uses has not been completed, or plans for development have not been formalized. A number of L-C properties, which were formerly used for agriculture but are now becoming ready for development, exist within the coastal zone. Several of these properties are included in the HMP with specified areas of onsite development and preservation that will be approved ("hardline" properties, such as Thompson-Tabata). Other properties are included in larger planning areas where general guidelines for preservation of habitat and wildlife corridor creation will apply ("standards areas" properties). The site lies within a "standards area" and within Local Facilities Management Zone 20 (Zone 20) as defined by the City's Growth Management Plan (GMP). The draft HMP provides that standards areas in Zone 20 that are located between Linkage F and Core Area #6 in the draft HMP are intended to support preservation of sensitive habitat and enhance wildlife movement between these areas.

The Carlsbad HMP is being prepared to satisfy the requirements of a federal Habitat Conservation Plan (HCP), and as a subarea plan of the regional Multiple Habitat Conservation Plan (MHCP). The MHCP study area involves approximately 186 square

miles in northwestern San Diego County. This area includes the coastal cities of Carlsbad, Encinitas, Solana Beach and Oceanside, as well as the inland cities of Vista and San Marcos and several independent special districts. The participating local governments and other entities will implement their portions of the MHCP through individual subarea plans such as the Carlsbad HMP. Once approved, the MHCP and its subarea plans will replace interim restrictions placed by the U.S. Fish and Wildlife Services (USFWS) and the California Department of Fish and Game (CDFG) on impacts to coastal sage scrub and gnatcatchers within that geographical area, and will allow the incidental take of the gnatcatcher and other covered species as specified in the plan.

The Carlsbad HMP and the MHCP will meet criteria for the California Department of Fish and Game's (CDFG) Natural Communities Conservation Planning process (NCCP). The objectives of the southern California NCCP program include identification and protection of habitat in sufficient amounts and distributions to enable long-term conservation of the coastal sage community and the California gnatcatcher, as well as other sensitive habitat types. Generally, the purpose of the HCP and NCCP processes is to preserve natural habitat by identifying and implementing an interlinked natural communities preserve system. Through these processes, the resource agencies are pursuing a long-range approach to habitat management and preserve creation over the more traditional mitigation approach to habitat impacts.

The standards areas involve several key undeveloped areas within the City that are located within the proposed habitat linkage corridors. The City's standards are focused geographically, using the Local Facilities Management Zones identified in the City's growth management plan. These properties are proposed to have conservation goals and standards which would allow at least 25% development of the site, but which provide for minimum conservation of 67% of coastal sage scrub and 75% of gnatcatchers on each site. Several areas have significantly higher standards for greater protection of individual resource areas. Emphasis is placed upon creation of preservation corridors and linkage to the larger MHCP habitat areas. Projects proposed within the standards areas also will require additional consultation with the City and the wildlife agencies to determine whether the project complies with the relevant standards and is consistent with the HMP. Upon receiving approval of their development plans, these properties will receive take authorization.

Additionally, when the LCP is updated, a provision will be incorporated to require those areas that have been placed under open space easements, for the purpose of habitat conservation, to be turned over to the management of an appropriate conservation agency with responsibility for the overall HMP preserve system. In the absence of a comprehensive LCP update, the Commission must consider the development pattern of this L-C zoned property that will be enabled by the proposed rezone without LCP development standards that address appropriate habitat buffers and open space linkages and corridors. Since the open space portions of the Thompson-Tabata site will be included in the HMP preserve area, the the proposed rezone should conform to the draft HMP in order to avoid potential future conflicts between the LCP and the HMP. Staff is currently working with the City of Carlsbad to develop LCP and HMP standards which will apply to future development on sites containing environmentally sensitive habitat

area, such as the subject site, to assure creation of a viable open space preserve system within the coastal zone and provision of adequate habitat buffers for new development. As submitted, the proposed LCP amendment addresses only the rezoning of the properties and does not include the LCP policy language necessary to coordinate the LCP and draft HMP.

In order to ensure preservation of the identified sensitive habitat areas, the Commission is suggesting modifications to the rezone to incorporate requirements into the City's certified LCP zoning map which would be applicable to approved development on the subject property. A condition of approval of the LCP amendment by the City acknowledges potential revisions must be submitted to the Planning Department and may require an amendment to the approval by the City. The suggested modifications would prohibit disturbance of the on-site coastal sage scrub and riparian areas and provide buffers adjacent to the habitat areas. The standards require the buffers to be revegetated with native, non-invasive species and address brush management activities, noise and lighting permitted adjacent to the buffer zones. The standards also require construction of a six-foot high wall to separate residential areas from the coastal sage scrub habitat. The standards also permanently restrict the allowable uses in both the habitat and buffer areas to ensure habitat protection through a conservation easement. No development shall be permitted within the habitat or buffer areas except as explicitly provided by the notes on the certified Zoning Map. With such modifications, the certified IP will ensure that the native vegetation habitat on the Thompson-Tabata site will be protected consistent with current laws protecting rare and endangered species in environmentally sensitive habitat areas.

Therefore, the Commission finds, in this particular case, that the Thompson-Tabata rezone can be approved with suggested modifications ahead of a comprehensive LCP update because the suggested modifications will protect the site's environmentally sensitive habitat. The preserved open space is also consistent with the habitat core and linkage areas identified in the draft HMP. Revisions to the City's approval of the associated development proposal will be required and will prohibit disturbance to the on-site riparian and coastal sage scrub vegetation. Adequate habitat buffer zones will be provided. The proposed residential areas are located next to existing roads and utilities that serve neighboring subdivisions, and will not require extension of services through the open space areas. Based upon a comprehensive review of the Thompson-Tabata development proposal, onsite resources, potential impacts, habitat buffers, relationship to the HMP, and the provisions of the LCP, the Commission finds that, as modified, the proposed rezone would be consistent with and adequate to carry out the resource protection policies of the certified Mello II LUP.

2. Preservation of Agricultural Lands

Preservation of agricultural use has been addressed in the Mello II LUP as follows:

Section 30242 of the Coastal Act states:

All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not feasible, or

(2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.

Amendments to the Carlsbad LCP certified by the Commission in 1985 essentially allow conversion of all of the agriculturally-designated lands within the City's Mello I and II segments. Such conversion is allowed pursuant to either (1) a determination of infeasibility of continued agricultural use based on area-wide studies, or (2) participation in a mitigation program designed to offset the loss of agricultural lands, or (3) payment of an agricultural mitigation fee.

The subject site is not designated in the Mello II LUP as either Prime or Non-Prime Agricultural Land. Since the properties are within the Coastal Agricultural Overlay Zone, the City's approval has been conditioned to ensure payment of an agricultural mitigation fee, which will mitigate the loss of agricultural resources by preserving or enhancing other coastal resources. The proposed rezones are consistent with above stated policy of the certified LUP pertaining to agricultural conversion, and are consistent with the certified LUP.

PART IV. CONSISTENCY WITH THE CALIFORNIA ENVIRONMENT QUALITY ACT (CEQA)

Section 21080.5 of the California Environmental Quality Act (CEQA) exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its local coastal program. Instead, the CEQA responsibilities are assigned to the Coastal Commission and the Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP.

Nevertheless, the Commission is required in a LCP submittal or, as in this case, a LCP amendment submittal, to find that the LCP, or LCP, as amended, conforms to CEQA provisions. The proposed Thompson-Tabata rezone, if modified as suggested by the Commission, will not result in an intensity of land use incompatible with the surrounding development, and on balance will result in clustered development and enhanced protection of coastal resources. The Commission's suggested modifications assure protection of coastal sage scrub and riparian habitat from disturbance by residential development that will be allowed under the new zoning. The Commission finds that there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect that the LCP amendments may have on the environment. Therefore, in terms of CEQA review, the Commission finds that approval of the LCP amendment will not result in any significant adverse environmental impacts.

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PLANNING COMMISSION RESOLUTION NO. 5072

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARLSBAD, CALIFORNIA, RECOMMENDING APPROVAL OF AN AMENDMENT TO THE CARLSBAD LOCAL COASTAL PROGRAM TO CHANGE 37.62 ACRES FROM LIMITED CONTROL (L-C) TO ONE FAMILY RESIDENTIAL WITH A QUALIFIED DEVELOPMENT OVERLAY (R-1-7,500-Q), AND A ZONE CHANGE OF 40.41 ACRES FROM LIMITED CONTROL (L-C) TO RESIDENTIAL DENSITY-MULTIPLE WITH A QUALIFIED DEVELOPMENT OVERLAY (RD-M-Q), BRINGING THE DESIGNATIONS ON THE LOCAL COASTAL PROGRAM, GENERAL PLAN, AND ZONING MAP INTO CONFORMANCE ON PROPERTY LOCATED NORTH AND SOUTH OF POINSETTIA LANE, BETWEEN AVIARA PARKWAY AND SNAPDRAGON DRIVE, IN LOCAL FACILITIES MANAGEMENT ZONE 20.

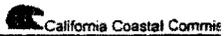
CASE NAME: THOMPSON/TABATA

CASE NO: LCPA 98-04

13 WHEREAS, California State law requires that the Local Coastal Program,
14 General Plan, and Zoning designations for properties in the Coastal Zone be in conformance; and

15 WHEREAS, Standard Pacific Homes, "Developer", has filed a verified
16 application for an amendment to the Local Coastal Program designations regarding property
17 owned by Standard Pacific Corporation and David B. Thompson and Karen R. Thompson,
18 "Owners", described as

19
20 The northeast quarter of the northeast quarter and the southeast
21 quarter of the northeast quarter of Section 28, Township 12 South,
22 Range 4 West, San Bernardino Meridian, according to the official
23 plat thereof; together with that portion of the southeast quarter of
24 Section 21, Township 12 South, Range 4 West of the San
25 Bernardino Meridian, according to the official plat thereof, shown
26 on Parcel B on a Certificate of Compliance recorded November
27 7, 1988 as File No. 88-569475 and on Record of Survey Map No.
28 12096, filed on March 23, 1989; all lying within the City of
Carlsbad, County of San Diego, State of California; except
therefrom those portions thereof vested with Tabata Brothers
Partnership by documents recorded November 13, 1972 as File No.
303362 and November 4, 1974 as Files No. 74-292547 and 74-
292548; and except therefrom those portions lying within Poinsettia
Lane and Rose Drive as described in Files No. 89-546752, 89-
637695, 90-146889 and 91-0036964 of Official Records

EXHIBIT NO. 1
APPLICATION NC
Carlsbad LCP
#1-2002D
Location Map
1 of 6
 California Coastal Commis

1 ("the Property"); and

2 WHEREAS, said verified application constitutes a request for a Local Coastal
3 Program Amendment as shown on Exhibit LCPA 98-04 dated November 7, 2001 as provided in
4 Public Resources Code Section 30574 and Article 15 of Subchapter 8, Chapter 2, Division 5.5 of
5 Title 14 of the California Code of Regulations of the California Coastal Commission
6 Administrative Regulations; and

7
8 WHEREAS, the Planning Commission did on the 7th day of November 2001 and
9 on the 5th day of December 2001 hold a duly noticed public hearing as prescribed by law to
10 consider said request; and

11
12 WHEREAS, at said public hearing, upon hearing and considering all testimony
13 and arguments, if any, of all persons desiring to be heard, said Commission considered all factors
14 relating to the Local Coastal Program Amendment.

15
16 WHEREAS, State Coastal Guidelines requires a six week public review period for
17 any amendment to the Local Coastal Program.

18
19 NOW, THEREFORE, BE IT HEREBY RESOLVED by the Planning
20 Commission of the City of Carlsbad, as follows:

- 21 A) That the foregoing recitations are true and correct.
- 22 B) At the end of the State mandated six week review period, starting on June 29,
23 2000, and ending on November 6, 2001, staff shall present to the City Council a
24 summary of the comments received.
- 25 C) That based on the evidence presented at the public hearing, the Commission
26 **RECOMMENDS APPROVAL** of THOMPSON/TABATA - LCPA 98-04
27 based on the following findings, and subject to the following conditions:

28 **Findings:**

1. That the proposed Local Coastal Program Amendment meets the requirements of, and is
in conformity with, the policies of Chapter 3 of the Coastal Act and all applicable policies
of the Mello II segment of the Carlsbad Local Coastal Program not being amended by
this amendment, in that it allows for the development of residentially designated lands

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with residential development and provides consistency between the Land Use Designations and Zoning designations of the Local Coastal Program.

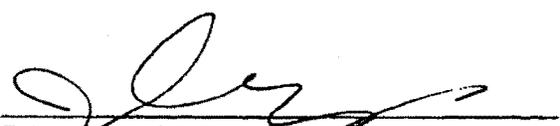
- 2. That the proposed amendment to the Mello II segment of the Carlsbad Local Coastal Program is required to bring it into consistency with Carlsbad Zoning Map.

Conditions:

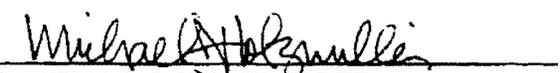
- 1. This approval is granted subject to the approval of ZC 98-08, CT 98-14, PUD 98-05, CP 00-02, SDP 99-06, HDP 98-15, and CDP 98-68 and is subject to all conditions contained in Planning Commission Resolutions No. 5071, 5073, 5074, 5075, 5076, 5077 and 5078 for those other approvals.
- 2. This approval is granted subject to the approval of the proposed Local Coastal Program Amendment by the California Coastal Commission. Any revisions to this approval by the California Coastal Commission must be submitted to and reviewed by the Planning Department for an evaluation of consistency with this approval; said revisions may require an amendment to this approval.

PASSED, APPROVED AND ADOPTED at a regular meeting to the Planning Commission of the City of Carlsbad, held on the 5th day of December 2001, by the following vote, to wit:

- AYES: Chairperson Segall, Commissioners Baker, Compas, Dominguez, Heineman, and Trigas
- NOES:
- ABSENT: Commissioner Nielsen
- ABSTAIN:


JEFFRE N. SEGALL, Chairperson
CARLSBAD PLANNING COMMISSION

ATTEST:


MICHAEL J. HOLZMUELLER
Planning Director

RECEIVED

JUL 17 2002

CITY OF CARLSBAD
PLANNING COMMISSION
SAN DIEGO COAST DISTRICT

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PLANNING COMMISSION RESOLUTION NO. 5071

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARLSBAD, CALIFORNIA, RECOMMENDING APPROVAL OF A ZONE CHANGE OF 37.62 ACRES FROM LIMITED CONTROL (L-C) TO ONE FAMILY RESIDENTIAL WITH A QUALIFIED DEVELOPMENT OVERLAY (R-1-7,500-Q, AND A ZONE CHANGE OF 40.41 ACRES FROM LIMITED CONTROL (L-C) TO RESIDENTIAL DENSITY-MULTIPLE WITH A QUALIFIED DEVELOPMENT OVERLAY (RD-M-Q) ON PROPERTY GENERALLY LOCATED NORTH AND SOUTH OF POINSETTIA LANE, BETWEEN AVIARA PARKWAY AND SNAPDRAGON DRIVE IN LOCAL FACILITIES MANAGEMENT ZONE 20.

CASE NAME: THOMPSON/TABATA
CASE NO: ZC 98-08

WHEREAS, **Standard Pacific Homes**, "Developer," has filed a verified application with the City of Carlsbad regarding property owned by **Standard Pacific Corporation** and **David B. Thompson and Karen R. Thompson**, "Owner," described as

The northeast quarter of the northeast quarter and the southeast quarter of the northeast quarter of Section 28, Township 12 South, Range 4 West, San Bernardino Meridian, according to the official plat thereof; together with that portion of the southeast quarter of Section 21, Township 12 South, Range 4 West of the San Bernardino Meridian, according to the official plat thereof, shown on Parcel B on a Certificate of Compliance recorded November 7, 1988 as File No. 88-569475 and on Record of Survey Map No. 12096, filed on March 23, 1989; all lying within the City of Carlsbad, County of San Diego, State of California; except therefrom those portions thereof vested with Tabata Brothers Partnership by documents recorded November 13, 1972 as File No. 303362 and November 4, 1974 as Files No. 74-292547 and 74-292548; and except therefrom those portions lying within Poinsettia Lane and Rose Drive as described in Files No. 89-546752, 89-637695, 90-146889 and 91-0036964 of Official Records

("the Property"); and

WHEREAS, said application constitutes a request for a Zone Change as shown on Exhibit "ZC 98-08" dated November 7, 2001, on file in the Planning Department,

CARLSBAD *1-2002D
LCPA

4

1 THOMPSON/TABATA – ZC 98-08 as provided by Chapter 21.52 of the Carlsbad Municipal
2 Code; and

3
4 WHEREAS, the Planning Commission did on the 7th day of November, 2001
5 and on the 5th day of December 2001 hold a duly noticed public hearing as prescribed by law to
6 consider said request; and

7 WHEREAS, at said public hearing, upon hearing and considering all testimony
8 and arguments, if any, of all persons desiring to be heard, said Commission considered all factors
9 relating to the Zone Change; and

10 NOW, THEREFORE, BE IT HEREBY RESOLVED by the Planning
11 Commission as follows:

- 12
13 A) That the foregoing recitations are true and correct.
14 B) That based on the evidence presented at the public hearing, the Commission
15 RECOMMENDS APPROVAL of THOMPSON/TABATA ZC 98-08 based on
16 the following findings and subject to the following conditions:

17 Findings:

- 18 1. That the proposed Zone Change from Limited Control (L-C) to One Family
19 Residential with a Qualified Development Overlay (R-1-7,500-Q and R-1-10,000-Q)
20 and Residential Multiple-Density with a Qualified Development Overlay (RD-M-Q)
21 is consistent with the goals and policies of the various elements of the General Plan, in
22 that the R-1-Q and RD-M-Q designations implement the existing RLM and RM
23 General Plan designations, respectively.
24 2. That the Zone Change will provide consistency between the General Plan and Zoning as
25 mandated by California State law and the City of Carlsbad General Plan Land Use
26 Element, in that the residential zoning designations would allow the appropriate
27 implementation of the existing residential General Plan designations.
28 3. That the Zone Change is consistent with the public convenience, necessity and general
welfare, and is consistent with sound planning principles in that it allows for the further
implementation of the Carlsbad General Plan and the Zone 20 Specific Plan (SP
201), which also recommends these zoning designations.

Conditions:

1. This approval is granted subject to the approval of LCPA 98-04, CT 98-14, PUD 98-05,
CP 00-02, SDP 99-06, HDP 98-15, and CDP 98-68 and is subject to all conditions

1 contained in Planning Commission Resolutions No. 5072, 5073, 5074, 5075, 5076,
2 5077 and 5078 for those other approvals.

3 **NOTICE**

4 Please take **NOTICE** that approval of your project includes the "imposition" of fees,
5 dedications, reservations, or other exactions hereafter collectively referred to for convenience as
6 "fees/exactions."

7 You have 90 days from date of final approval to protest imposition of these fees/exactions. If
8 you protest them, you must follow the protest procedure set forth in Government Code Section
9 66020(a), and file the protest and any other required information with the City Manager for
10 processing in accordance with Carlsbad Municipal Code Section 3.32.030. Failure to timely
11 follow that procedure will bar any subsequent legal action to attack, review, set aside, void, or
12 annul their imposition.

13 You are hereby **FURTHER NOTIFIED** that your right to protest the specified fees/exactions
14 **DOES NOT APPLY** to water and sewer connection fees and capacity charges, nor planning,
15 zoning, grading or other similar application processing or service fees in connection with this
16 project; **NOR DOES IT APPLY** to any fees/exactions of which you have previously been given
17 a **NOTICE** similar to this, or as to which the statute of limitations has previously otherwise
18 expired.

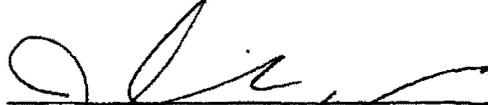
19 **PASSED, APPROVED AND ADOPTED** at a regular meeting of the Planning
20 Commission of the City of Carlsbad, held on the 5th day of December 2001, by the following
21 vote, to wit:

22 **AYES:** Chairperson Segall, Commissioners Baker, Compas, Dominguez,
23 Heineman, and Trigas

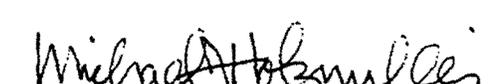
24 **NOES:**

25 **ABSENT:** Commissioner Nielsen

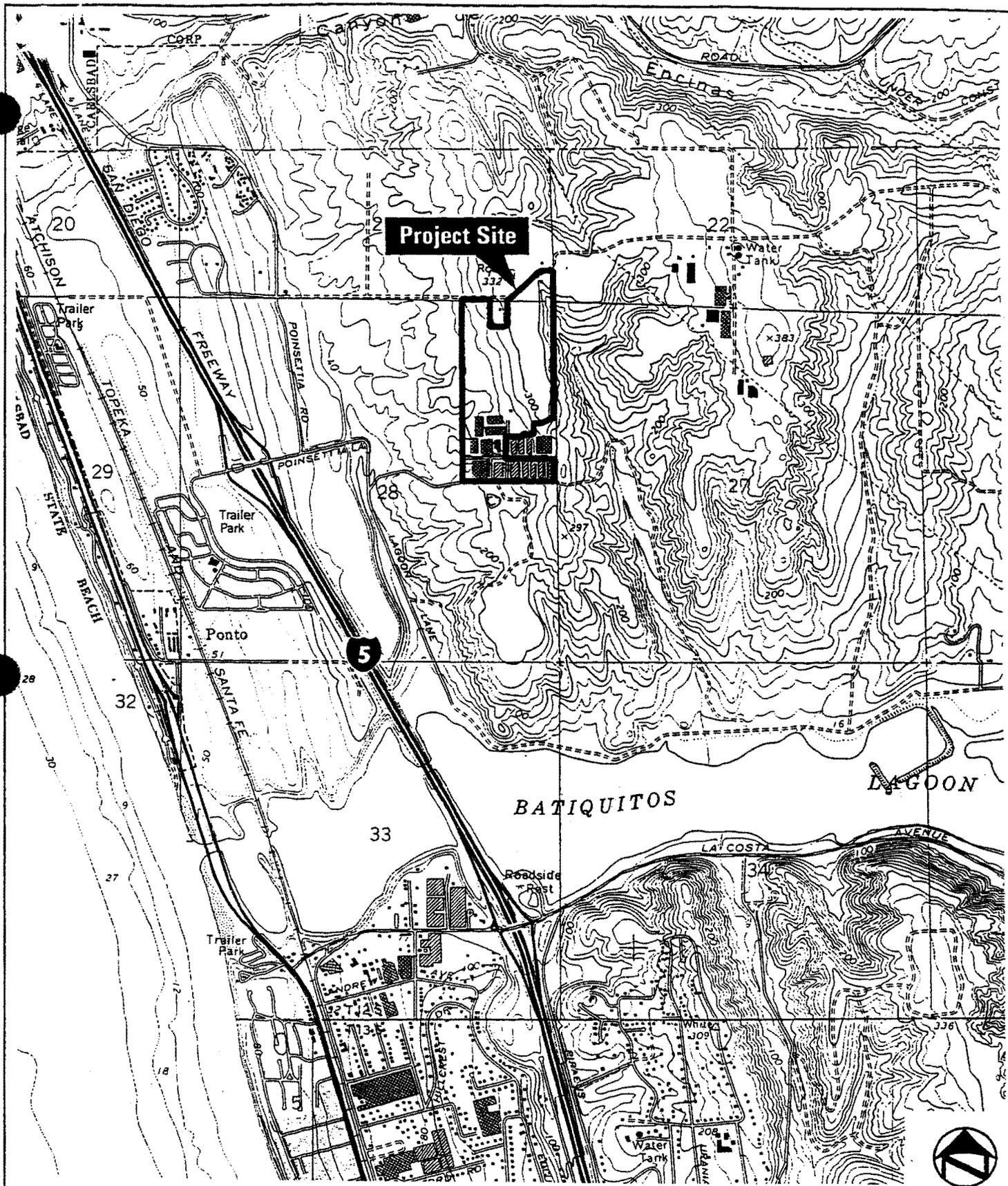
26 **ABSTAIN:**

27 
28 _____
29 JEFFREY N. SEGALL, Chairperson
30 CARLSBAD PLANNING COMMISSION

31 **ATTEST:**

32 
33 _____
34 MICHAEL J. HOLZMUELLER
35 Planning Director

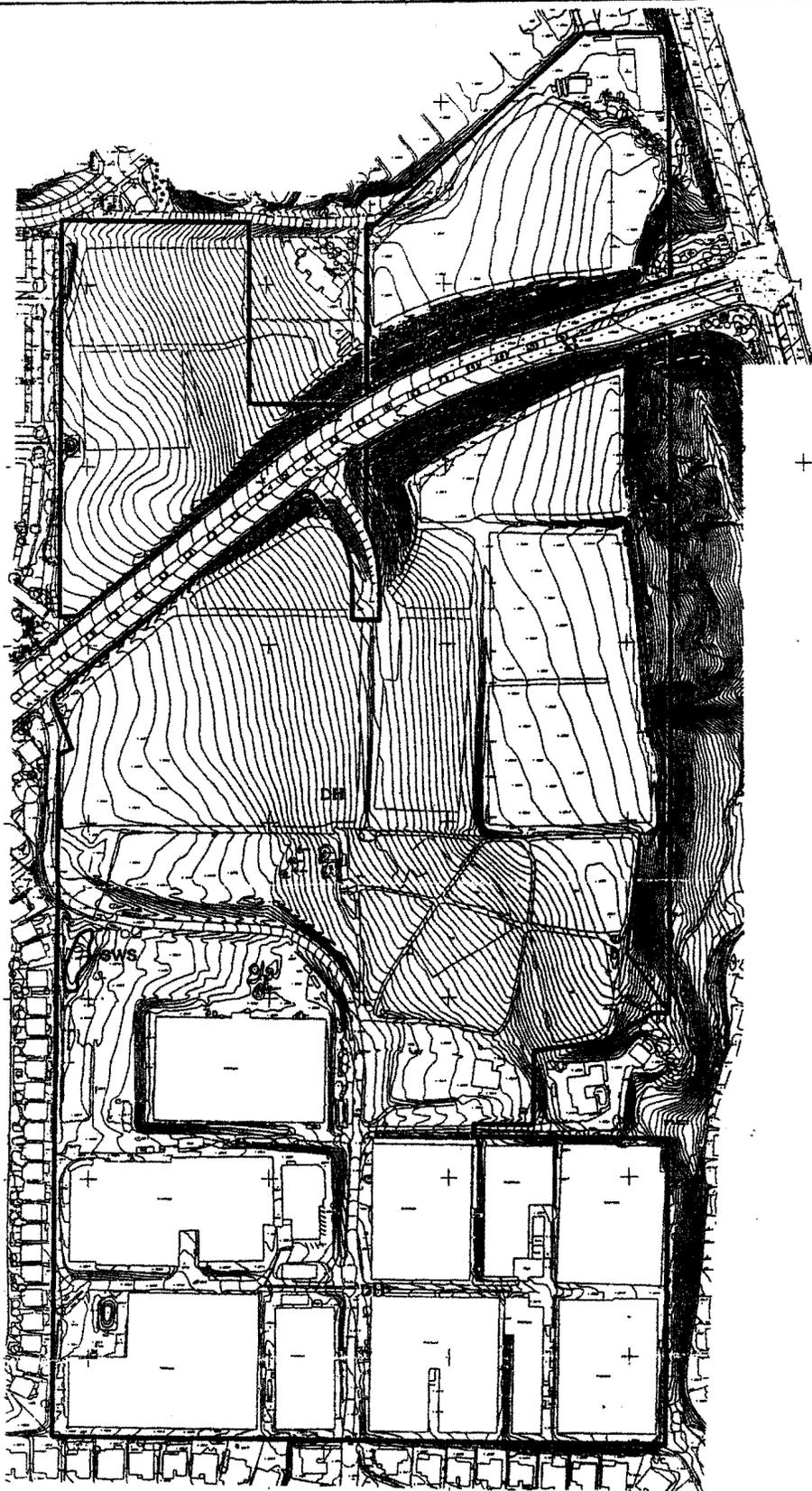
36 PC RESO NO. 5071



BASE MAP SOURCE: USGS 7.5 Minute Series, Encinitas Quadrangle

Thompson Property - Biological Resources Letter Report & Impact Analysis
Vicinity Map

EXHIBIT NO. 2
 APPLICATION NO
**Carlsbad LCP
 #1-2022D**
 Location Map



Vegetation Types/Landcovers:

- CSS Coastal Sage Scrub
- SWS Southern Willow Scrub
- DH Disturbed Habitat

BASE TOPO SOURCE: Buccola Engineering



EXHIBIT NO. 3
 APPLICATION
Carlsbad L.A.
#1-2002D
 Biological Resources
 Map
 California Coastal Commission

Thompson Property - Biological Resources Letter Report & Impact Analysis
Biological Resources Map