

Mailed 5/1/15  
**FILE**



May 1, 2015

Mike Howes  
Howes Weiler & Associates  
Suite 217  
2888 Loker Avenue East  
Carlsbad, CA 92010

**SUBJECT: 1st REVIEW FOR GPA 15-01/MP 175(L)/LCPA 15-03/HMP 15-04/MS 15-05/CT 15-02/CT 15-03/PUD 15-07/PUD 15-08/SDP 15-07/SDP 15-08/CDP 15-14/CDP 15-15 – PONTO BEACHFRONT VILLAGE EAST AND PONTO BEACHFRONT VILLAGE WEST**

Thank you for applying for Land Use Permits in the City of Carlsbad. The Planning Division has reviewed your General Plan Amendment, Master Plan Amendment, Local Coastal Program Amendment, Habitat Management Plan, Minor Subdivision, Carlsbad Tract Maps, Planned Development Permits, Site Development Plans, and Coastal Development Permits, applications no. GPA 15-01/MP 175(L)/LCPA 15-03/HMP 15-04/MS 15-05/CT 15-02/CT 15-03/PUD 15-07/PUD 15-08/SDP 15-07/SDP 15-08/CDP 15-14/CDP 15-15, as to its completeness for processing.

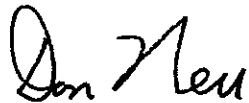
Due to the legislative actions (GPA, MP and LCPA) required for this project the Permit Streamlining Act does not apply; and therefore, the application must remain incomplete until approved by the City Council. Although the initial processing of your application may have already begun, the technical acceptance date is acknowledged by the date of this communication. The City may, in the course of processing the application, request that you clarify, amplify, correct, or otherwise, supplement the basic information required for the application. In addition, you should also be aware that various design issues may exist. These issues must be addressed before this application can be scheduled for a hearing. The Planning Division will begin processing your applications as of the date of this communication.

Notwithstanding the above, attached are two lists. The first list is information which must be submitted to complete your application. The second list is project issues of concern to staff. In order to expedite the processing of your application, the "incomplete" items and your response to the project issues of concern to Staff must be submitted directly to your staff planner; therefore, please contact your staff planner directly to schedule a re-submittal appointment. As part of your re-submittal package, please prepare and include with your re-submittal: 1) a copy of these lists; 2) a detailed letter summarizing how all identified incomplete items and/or project issues have been addressed; and 3) five (5) sets of revised plans, plus one (1) extra copy of landscape concept plans. No processing of your application can occur until the application is determined to be complete.

In order to expedite the processing of your application, you are strongly encouraged to contact your Staff Planner, Jason Goff, at (760) 602-4643, to discuss or to schedule a meeting to discuss your application and to completely understand this letter. You may also contact each commenting department individually as follows:

- Land Development Engineering Division: Steve Bobbett, Associate Engineer, at (760) 602-2747
- Christina Vincent, Economic Development Manager, at (760) 602-2712
- Building Division: Will Foss, Building Official, at (760) 602-2716
- MELA: Michael Elliott, Consulting Landscape Architect, at (760) 944-8463
- Police: Jodee Sasway, Community Relations Manager, at (760) 931-2105
- Fire Department: Greg Ryan, Fire Inspections, at (760) 602-4661

Sincerely,



**DON NEU, AICP**  
City Planner

DN:JG:fn

Attachments:

1. Economic Development Memorandum dated May 7, 2015
  2. MELA Redlines – Ponto Beachfront Village East – Concept Landscape Plans dated April 21, 2015
  3. MELA Redlines – Ponto Beachfront Village West – Concept Landscape Plans dated April 21, 2015
  4. Police Department Letter, Ponto Beachfront Village East dated April 24, 2015
  5. Police Department Letter, Ponto Beachfront Village West dated April 24, 2015
- c: LSF5 Carlsbad Holdings, LLC, Suite 1800, 2711 North Haskell Avenue, Dallas, Texas 75204  
Shopoff Realty Investments, Suite 700, 2 Park Place, Irvine, CA 92614  
Gary Barberio, Assistant City Manager  
Don Neu, City Planner  
Christina Vincent, Economic Development Manager  
Will Foss, Building Official  
Steve Bobbett, Associate Engineer  
Michael Elliott, MELA  
Greg Ryan, Deputy Fire Marshal  
Michele Masterson, Senior Management Analyst  
File Copy  
Data Entry

**LIST OF ITEMS NEEDED  
TO COMPLETE THE APPLICATION**

**Planning:**

**Technical Studies:**

1. Greenhouse Gas (GHG) Emissions Study: The Ponto Beachfront Village Vision Plan Final Program Environmental Impact Report (EIR 05-05) made mention to GHG within the Air Quality sections of the EIR, however, it did not analyze GHG impacts at the project level. Therefore, the project will be need to analyze its greenhouse gas emission impacts pursuant to the California Environmental Quality Act (CEQA) Statutes and Guidelines, Appendix G. Please provide a study that analyzes the project and its impacts on the environment as it relates to Greenhouse Gas (GHG) Emissions. If any potentially significant impacts are identified in the course of this analysis, please include the proposed mitigation that would reduce impacts to less than significant where applicable.
2. Energy Conservation: Please provide an Energy Conservation Analysis of the project as it relates to the California Environmental Quality Act (CEQA) Statutes and Guidelines, Appendix F.
3. Water Supply Analysis: Please provide a Water Supply Analysis covering the proposed project.
4. Noise Study: Please submit a site specific noise study analysis in accordance with Final Program EIR 05-05 Mitigation Measure N-3a. Please note that the City of Carlsbad's *Noise Guidelines Manual* can be reviewed online by visiting the City of Carlsbad's Planning Division Website at:  
  
<http://www.carlsbadca.gov/civicax/filebank/blobload.aspx?BlobID=24094>
5. Biological Resources Analysis: The Ponto Beachfront Village Vision Plan Final Program Environmental Impact Report (EIR 05-05) analyzed the Ponto Beachfront Village Vision Plan's overall impacts on biological resources and provided mitigation measures to reduce impacts to a level of less-than-significant. While the subject project appears to be within the scope of the Ponto Beachfront Village Vision Plan and the previously approved final program EIR 05-05, staff requires a site specific biological resources study that analyzes and quantifies the site specific project impacts on a biological resources level and also demonstrates how the project will specifically comply with the mitigation measures described in the EIR.
6. Economic Impacts Study: We are in the process of searching for the Kaiza Poinsettia Master Plan Economic Impact Study as discussed on pg. 107, under Items No. 4a and 4b of the Poinsettia Shores Master Plan. We have noted this item as an incompleteness item until such time as we can deem it otherwise.

**Land Use Review Application:**

7. Ownership Information: Please provide the recorded documents authorizing Marc L. Lipshy to sign on behalf of LSF5 Carlsbad Holdings, LLC, and bind said LLC with the City through a Notice of Restriction as consented to on pg. 2 of the Land Use Review Application (Form P-1).

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8. Environmental Impact Assessment (EIA) Information Form (P-1D): Please complete EIA information form P-1(D). This form can be found online by visiting the City of Carlsbad's Planning Division Website at:

<http://www.carlsbadca.gov/civicax/filebank/blobdload.aspx?BlobID=24099>

**Required Permits:**

9. Local Facilities Management Plan (LFMP) Amendment (Zone 9): Pursuant to the Poinsettia Shores Master Plan, Planning Area F, Development Standard No. 2 on pg. 105 " a future Major Master Plan Amendment and LCP amendment will be required prior to further development approvals for Planning Area F." Furthermore, according to EIR 05-05, future development proposals are required to demonstrate that proposed facilities are consistent with the LFMP or propose an amendment to reflect resulting conditions. Please note that the Zone 9 LFMP does not address the development of this area (i.e., west of the AT&SF railroad tracks). Therefore, an amendment to the Zone 9 LFMP is required as part of the proposed Poinsettia Shores Master Plan Amendment (MP 175(L)).
10. Planned Development Permit: Due to the proposed subdivision of the East Village into two (2) separate lots, an additional Planned Development Permit (PUD) is required.
11. Site Development Plan: Due to the proposed subdivision of the East Village into two (2) separate lots, an additional Site Development Plan (SDP) is required. This requirement is pursuant to C.M.C. Section 21.53.120; where it states that any multiple-family residential development having more than four (4) dwelling units or an affordable housing project of any size shall require the processing of a Site Development Plan (SDP) in accordance with Chapter 21.06 (Q Qualified Development Overlay Zone).
12. Coastal Development Plan: Due to the proposed subdivision of the East Village into two (2) separate lots, an additional Coastal Development Permit (CDD) is required.

**Master Plan Amendment (MP 175(L)):**

13. Please submit digital copies (in Microsoft Word format) of the proposed Master Plan Amendment.
14. Please be aware, that the density transfer that is being proposed between Lots 1 and 2 of the proposed parcel map for the East Village may be permitted through the Master Plan Process provided that the combined density of the two areas do not exceed the maximum density allowed for the East Village area (currently showing the R-23 General Plan land use designation proposed). This will need to be specifically written into the proposed Master Plan Amendment as a special development standard; and you should be aware that the final map will be conditioned with the following non-mapping code reminder:

*Developer shall provide the following note on the final map of the subdivision and final mylar of this development submitted to the City:*

- A. *"Chapter 21.90 of the Carlsbad Municipal Code established a Growth Management Control Point for each General Plan land use designation. Development cannot exceed the Growth Control Point except as provided by Chapter 21.90. The land use designation for this development is \_\_\_\_\_ dwelling units per non-constrained acre.*

*Parcels \_\_\_\_\_ were used to calculate the intensity of development under the General Plan and Chapter 21.90. Subsequent redevelopment or resubdivision of any one of these parcels must also include parcel(s) \_\_\_\_\_ under the General Plan and Chapter 21.90 of the Carlsbad Municipal Code."*

**Required Plans:**

15. The Architectural Site Plan(s) must be revised to contain the following "General Information" pursuant to Section A.1 of the Development Permits – Form P-2. Please update the architectural site plans accordingly:
- a. Name and address of owner whose property is proposed to be developed and the name, address, and phone number of the developer.
  - b. Name, address, and phone number of registered civil engineer, licensed surveyor, landscape architect or land planner who prepared the maps/plans.
  - c. North arrow and scale.
  - d. Vicinity Map showing major cross streets.
  - e. Date of preparation/revisions.
  - f. Project Name and application types submitted.
  - g. Tentative Map number in upper right hand corner.
  - h. All facilities labeled as "existing" or "proposed."
  - i. A summary table of the following:
    - 1) Street address, assessor's parcel number, and legal description.
    - 2) Site acreage.
    - 3) Existing Zone and General Plan Land Use Designation.
    - 4) Existing and Proposed land use.
    - 5) Classification of lots as to intended residential, commercial, industrial or other uses.
    - 6) Number of units to be constructed when a condominium or community apartment project is involved.
    - 7) Total number of lots proposed.
    - 8) Proposed density in dwelling units per net acre.
    - 9) Total building coverage.
    - 10) Building square footage.
    - 11) Percent of site to be landscaped.
    - 12) Number of parking spaces required/provided. Be sure to quantify those required for Visitor and those required for the individual Community Recreation Space.
    - 13) Square Footage of open or recreational space, for each unit and total common open space for the project.

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- 14) Area of the site which is undevelopable per Zoning Ordinance Section 21.53.230 (include the acreage in each category). If not applicable, state on the plans.
  - 15) Cubic footage of storage space (if applicable). Show location.
  - 16) Average Daily Traffic generated by the project, broken down by the separate uses.
  - 17) Name of sewer, water and school district providing service to the project.
  - 18) Proposed water demands (GPM or GPD) and sewer generation (EDU) resulting from project.
  - 19) Proposed drainage discharge (CFS) and master drainage basin.
16. The Architectural Site Plan(s) must be revised to contain the following "Site Information" pursuant to Section A.2 of the Development Permits – Form P-2. Please update the architectural site plans accordingly. Where additional sheets may be required to convey the level of detail required, please provide.
- a. Approximate location of existing and proposed buildings, walls, fences, and permanent structures onsite and within 100 feet of site.
  - b. Location of railroads.
  - c. Legal description of the exterior boundaries of the subdivision (approximate bearings, distances and curve data).
  - d. Lot lines and approximate dimensions and number of each lot.
  - e. Lot area for each proposed lot.
  - f. Setback dimensions for the required front, rear and side yard setbacks for all structures.
  - g. Distance between buildings and/or structures.
  - h. Indicate top and bottom elevations for all fences, walls, and retaining walls. Show these elevations at each end of the wall and in the middle. Also show the worst condition elevation.
  - i. Show site details (specific recreation facilities) for all recreation lots or areas. Please be sure to label all amenities, floor area of any buildings, total area of recreation facility, etc.
  - j. Location and dimensions of all accessways and pathways as required for compliance with Title 24 – State Accessibility Requirements.
17. The project Elevation and Floor Plans must contain the following "General Information" pursuant to Section C.1 of the Development Permits – Form P-2. Please update the architectural plans accordingly:
- a. Floor plans with square footage included. Please label the floor plans the square footage of each private patio and balcony area. Where a minimum dimension is required by the Planned Development Ordinance for compliance with private recreation area, please be sure to label this dimension.
  - b. All elevations of existing and proposed buildings, including signs and exterior lights. Please note any monument type signs being proposed should be shown now and included as part of the individual Coastal Development Permits (CDP), in that the California Coastal Commission now requires a CDP for all monument signs within the Coastal Zone. For any of these type signs, please be sure to provide detailed elevations, and label their dimensions and total area.
  - c. Location and size of required storage areas.
  - d. Include a scale on all floor plans and building elevations.
  - e. Indicate the height on all building elevations.

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- f. Indicate on all building elevations, compliance with Carlsbad Building Height definition (Zoning Ordinance Section 21.04.065). Please be aware that we have already begun receiving complaints from the adjacent communities regarding the proposed buildings being too tall, specifically the Apartment Condos and Mixed Use development. As such, staff does not support the proposed building height as being defined in the proposed Master Plan Amendment (MP 175(L)) document and can only support compliance with the RD-M Zoning development standard relating to a 35 ft. maximum building height (CMC Section 21.24.030) and as measured in accordance with the Carlsbad Building Height definition as defined in CMC Section 21.04.065.
- g. Indicate ceiling height or the height of the underside of the roof in any building areas intended for storage uses.
- h. Indicate the California Building Code occupancy classifications of all building areas.
- i. Indicate type of construction per the California Building Code.
- j. ROOF PLAN(S): Show roof design to include ridges, hips, slope direction, etc. Show location of roof appurtenances, mechanical equipment and screening. This is especially important for the Apartment Condos and Mixed Use buildings where roof top mechanical equipment most likely will be utilized. Be sure to show all roof top equipment, appurtenances, stairways or other access provisions, including those required by the applicable building, plumbing, electrical and mechanical codes. All roof mounted equipment shall be installed in accordance with Building Department Policy 80-6.

#### Engineering:

1. MS 15-05 Ponto Beachfront Village, should show all infrastructure improvements required to provide the backbone improvements for the development of Parcels A and B. The improvements should include but not be limited to the following:
  - The improvement of Ponto Drive from Avenida Encinas, north to the angle point in Ponto Drive (approximately Station 10+00 to Station 23+00).
  - The extension of public sewer from the existing pump station east of the NCTD right of way approximately 280' south of the centerline of Avenida Encinas, north to serve proposed Parcels A and B. The width of the offsite sewer easement south of Avenida Encinas should be anticipated to be approximately a minimum of 60' in width to accommodate construction. Final design drawings may reduce the required width based upon construction methods proposed and approved.

The typical cross sections for Ponto Drive and the layout sheet(s) for the offsite sewer south of Avenida Encinas should be included with the application for MS 15-05 Ponto Beachfront Village.

2. CT 15-02 (Ponto Beachfront Village East) and CT 15-03 (Ponto Beachfront Village West) should show the above improvements as being constructed by MS 15-05. Include a note on the cover of the tentative subdivision maps to the effect that, if the above improvements are not constructed prior to the discretionary approval of CT 15-02 and CT 15-03, the subdivision development agreements for these maps will include the requirement to secure their construction.
3. Two (2) copies of a Circulation Impact analysis should be included with the applications for CT 15-02

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Ponto Beachfront Village East, and CT 15-03 Ponto Beachfront Village West.

4. Two (2) copies of preliminary soils/geologic report should be included with the applications for CT 15-02 Ponto Beachfront Village East as the project proposes cuts exceeding 5 feet in depth.

**Economic Development:**

1. Please update the Market Opportunity Analysis to include current market trends through Q-1 2015 as there has been additional retail that has entered the market and might influence the proposed tenant composition.

**ISSUES OF CONCERN**

**Planning:**

1. A detailed listing of Planning Division issues will follow under separate cover. However, for the time being, staff has provided the following overarching issues regarding this proposal.
2. Project density is far exceeding the number of dwelling units that the city has available to allocate to these sites (i.e., East Village by 25 units, West Village by 30 units). The General Plan update is recommending an allocation of 124 dwelling units based on the Growth Control Point for the R-23 land use designation proposed on the portion of the property identified as Ponto Beachfront Village East and an allocation of 12 dwelling units (.25 x 3.07 net acres = 0.7675 acres x 15 du/ac = 11.5 or 12 dwelling units) based on a minimum of 15 du/ac for mixed use projects such as that being proposed on the portion of the property identified as Ponto Beachfront Village West. As indicated in our last Preliminary Review (PRE 14-22), staff cannot support a request for any additional dwelling unit allocations above that being recommended through the current General Plan update for this site.
3. Please be aware that staff has already begun receiving complaints from the adjacent communities regarding the proposed buildings being too tall, specifically the East Village Apartment Condos and West Village Mixed Use development. As such, staff is unable to support the proposed building heights as illustrated in the project elevations or as being defined in the proposed Master Plan Amendment (MP 175(L)) document. However, the following could be supported:
  - a) For the East Village we could support a 35 ft. maximum building height consistent with the development standards of the RD-M (Residential Density-Multiple) Zone, which the proposed General Plan update is recommending as the underlying zoning for the East Village portion of the site; and
  - b) For the West Village we could support a 35 ft. maximum building height, with the possibility of going to a 40 ft. maximum with increased setbacks as discussed in CMC Section 21.28.030, which is consistent with the development standards of the C-2 (General Commercial) Zone, which is furthermore consistent with what the proposed General Plan update is recommending as the underlying zoning for the West Village portion of the site.



However, please note that building height must be measured in accordance with the established Carlsbad Building Height definition as defined in CMC Section 21.04.065. You will need to revise your project design and Master Plan Amendment to comply with this development standard. Additionally, an allowed protrusions above height limits, as permitted under CMC Section 21.46.020 could also be supported.

4. Please also be aware that staff has already begun receiving complaints from the adjacent communities regarding the limited amount of commercial being proposed (i.e. 13,000 sq. ft.). These concerns are consistent with staff direction in past Preliminary Review applications:

*(PRE 14-22, dated July 31, 2014) "Consistent with the objectives of the Vision Plan, staff continues to strongly emphasize and encourage the project applicant to provide greater retail/restaurant floor area on the mixed-use site. One of the goals of the General Plan update is to provide an increase in commercial services in close proximity to the coastline and to provide places where people want to gather. The mixed-use center is intended to be the core of the Ponto Beachfront Village offering visitor-serving and neighborhood serving uses to the residents of this area and surrounding developments as well as the existing and future resort hotels. This proposal results in a significant reduction of that which was originally assumed in the previously certified Ponto Beachfront Village Vision Plan Environmental Impact Report (EIR 05-05, SCH#2007031141)."*

The Market Opportunity Analysis was routed to our Economic Development staff for review and comment. Staff's conclusions are illustrated in the attached memorandum dated May 7, 2015, which aside from a request for some additional updated information (see incompleteness items above) appears to validate the conclusions in the report. This information could have potential effects on the proposed General Plan Update, which staff will need to discuss internally. In going forward, especially with the public input that has already been received and potential Coastal Commission interest, staff will want to ensure that every avenue has been exhausted as it relates to maximizing the total amount of commercial being offered on this site.

5. The Planning Division and Land Development Engineering would like to request a meeting to discuss the organization of this project application and the applicant's objective prior to any resubmittals or additional application submittals:

**MELA:**

Please note that the numbers below are referenced on the attached set of red line plans for ease of locating the specific area of comment concern.

**Ponto Beachfront East Village**

1. The monument sign does not appear to match the project gateway concepts provided in the Ponto Beachfront Village Vision Plan (PBVVP) chapter 2, page 31 figures. Please better match the approved concepts with battered pilasters and beach pebble/river rock pilasters and walls.
2. The PBVVP specifies a Ponto Beachfront village gateway at the northerly end of Ponto Drive. Please address.

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3. Please obtain review and approval of medians from the Parks Division. Provide documentation of approvals for cross checking. Insure compliance with the PBVVP.
4. Plans are too conceptual to provide an appropriate review. Several symbols are used for many trees and one symbol is used for all shrubs and ground covers which may be very different in size and character. Please provide a separate symbol for each tree and a separate symbol for each type of shrub (i.e. large evergreen shrub, medium size shrub, small flowering accent shrub, etc.) and ground covers. Final comments are reserved pending receipt of more complete plans.
5. Invasive species shall not be added to a landscaped area. *Echium fastuosum* is listed as an invasive species. Please provide a substitute.
6. Please provide parkway street trees for Ponto Drive that are consistent with the PBVVP (see page 34 of the PBVVP).
7. Please identify all symbols used on the plans in the legend.
8. Please show all water and sewer lines on all plan sheets and insure no conflicts with landscaping.
9. Separate water service for landscaping (including, but not limited to connections, water meters, and back flow preventers) shall be provided for all commercial/industrial projects, golf courses, parks, and residential common areas in projects over four (4) dwelling units. Please address.
10. The PBVVP indicates that "Landscaping should enhance the quality of development by framing and softening the appearance of buildings, enhancing the overall image, screening undesirable views and providing shade and wind protection". The vision plan also indicates that "Planters and pots placed in building recesses and adjacent to blank walls are encouraged...Planter and pot materials should complement the building architecture". "Landscaping should be in scale with adjacent buildings and be of appropriate size at maturity." Additional landscaping to include trees may be needed along garage sides of the townhome buildings. Please address the above vision plan guidelines. The Landscape Manual indicates that landscape plans are to feature ground cover, shrubs, and trees to screen elements of unsightliness and screen/soften new improvements. The Landscape Manual also indicates that landscaping shall be used to accentuate and enhance architecture. Please identify the proposed plantings and insure they are appropriate along the garage sides of all buildings to both soften and enhance these elevations.
11. Please coordinate landscape plans with civil plans. Check all areas insuring coordination. Provide a copy of the latest civil plans with the next submittal for cross checking.
12. Please coordinate with the civil to relocate the water line and coordinate the tree with the fire hydrant.
13. Please correct the match line numbers. Check all sheets.
14. Please show and label all property lines, right-of-ways, easements and utilities on all plan sheets and insure no conflicts with landscaping. No trees are allowed within public utility easements.

15. The plan shall demonstrate that plants, when installed and at maturity, will be positioned to avoid obstructing motorists' views of pedestrian crossings, driveways, roadways and other vehicular travel ways. On collector streets and larger, landscape elements over 30 inches in height (including planting measured at maturity) as measured from adjacent street grade are not permitted at street corners within a triangular zone drawn from two points, 25 feet outward from the beginning of curves. At medium to high use driveways, the 30 inch height limitation applies at driveways 25 feet from the edge of the apron outward along the curb, then 45 degrees in toward the property. Landscape features (shrubs, trees, fencing, etc.) shall be selected to ensure that no visual impairments or obstructions are located within the CalTrans sight distance lines. Please show and label all vehicular sight lines per the above and insure no conflicts.
16. 50% of the shrubs (except on slopes 3:1 or steeper) shall be a minimum 5 gallon size. Please address.
17. Generally identify all existing woody plant material to be removed or retained. Trees over 12" in caliper diameter shall be identified on the plan individually as to caliper size and type and labeled to be retained or removed.
18. The planting plan and palette shall include tree types and quantities and shrub types and spacing with general layout. Please address.
19. Please address maintenance of all areas including the Ponto Drive median and parkway along Avenida Encinas.
20. An encroachment permit is required for any enhanced paving located within the public right-of-way. Please add a note clarifying this requirement on the landscape plans and coordinate with the civil to show any enhanced paving within the right-of-way on their plans and add this same note to the civil plans.
21. The PBVVP indicates that "Trees and plants native to the Southern California coast or those which flourish in the region should be selected whenever possible." The Landscape Manual indicates that native and drought tolerant plant materials are to be incorporated whenever possible. Please address.
22. All utilities are to be screened. Please locate all light poles on the landscape plans and insure that there are no conflicts with trees.
23. Please add the following bold portions of the notes to the slope re-vegetation notes on the plans:
  - Slopes – 6:1 or steeper and:
    - a. 3' or less in vertical height and are adjacent to public walks or streets require at minimum Standard #1.
    - b. 3' to 8' in vertical height require Standards #1 (**erosion control matting shall be installed in lieu of a cover crop**), #2 and #3.
    - c. In excess of 8' in vertical height require Standards #1 (**erosion control matting shall be installed in lieu of a cover crop**), #2, #3, and #4.

24. Please revise the paving hatch symbol to be different from the turf hatch symbol.
25. The Ponto Beachfront Village gateways should be different from the townhome entry monumentation. Please resolve. Provide a conceptual sketch of each indicating materials, finishes, heights, etc.
26. Please provide conceptual sketches of the 5' high masonry wall with pilasters; the pool area entry overhead trellis; the 6' split face wall; and the shade structure for review indicating heights, materials and finishes.
27. Please confirm that recycled is currently available along Avenida Encinas and add notes as appropriate to indicate the use of recycled water. Show the recycled water mainline in the street. Irrigation systems for all projects, except for service to a single-family residence or front yard irrigation on individually metered condos, shall be designed to use non-potable, treated recycled water, unless an exemption is approved by the City Utilities Division.
28. Provide a colored or hatched plan clearly showing where recycled water, graywater and potable water are proposed to be used for irrigation. See comment 27 above. The plan will be forwarded to Carlsbad Municipal Water District for review. Any comments will be returned to the applicant.
29. Concept plans shall include calculations which document the maximum allowed annual water use for the landscaped area or maximum applied water allowance (MAWA) and estimated total water use (ETWU). A landscape project shall not exceed the MAWA. The MAWA for a landscape project shall be determined by the following calculation as defined in the City ordinance:  $MAWA = (ETo)(0.62)[(0.7 \times LA) + (0.3 \times SLA)]$ . The ETWU shall be determined by the following calculation as defined in the Landscape Manual:

$$ETWU = (ETo)(0.62) \left( \frac{PF \times HA}{IE} + SLA \right)$$

Please provide calculations and worksheets on city forms as found in the Landscape Manual. In addition to the calculations, include a statement on the plans signed under penalty of perjury by the person who prepared the plan that provides:

"I am familiar with the requirements for landscape and irrigation plans contained in the city of Carlsbad's landscape manual and water efficient landscape regulations. I have prepared this plan in compliance with those regulations and the landscape manual and agree to comply with all requirements when submitting construction documents. I certify that the plan implements those regulations to provide efficient use of water."

30. The surface area of a water feature, including swimming pools, shall be included in a high water use hydrozone and made a part of the water use calculations. Please include all water features including the spa and fountains.
31. The plan shall provide that only low volume or subsurface irrigation shall be used to irrigate any vegetation within twenty-four inches of an impermeable surface unless the adjacent impermeable surfaces are designed and constructed to cause water to drain entirely into a landscaped area.

32. Please address the public trail along the railroad per the Poinsettia Shores Master Plan (PSMP) on page 27.
33. Please provide landscaping along Avenida Encinas that is compatible/consistent with existing plantings to the east to provide street scene continuity. The PSMP calls for Podocarpus gracilior as the dominant tree. Existing plantings to the east include Podocarpus gracilior and Pinus canariensis along with the Washingtonia robusta. Please note that no new Washingtonia robusta should be incorporated as it is listed as an invasive species. Insure coordinate with the PBVVP and coastal conditions.
34. The PSMP addresses view preservation in exhibits 12 and 22 on pages 52 and 53. Please review and address.
35. **RETURN REDLINES and provide 2 copies of all plans (concept, water conservation, fire suppression; and colored water use plan) for the next submittal. Please provide a written response to all comments clearly indicating where and how each comment was addressed.**

**Ponto Beachfront Village West**

1. The monument sign does not appear to match the project gateway concepts provided in the Ponto Beachfront Village Vision Plan (PBVVP) chapter 2, page 31 figures. Please better match the approved concepts with battered pilasters and beach pebble/river rock pilasters and walls.
2. It is not clear where this monument sign wall is located. Please clearly note the location on the plan.
3. The PBVVP specifies a Ponto Beachfront village gateway at the intersection of Avenida Encinas and Carlsbad Boulevard. Please address.
4. The PBVVP provides for Carlsbad Boulevard landscaping. Please address to meet the Vision Plan guidelines and Landscape Manual requirements.
5. Please obtain review and approval of medians from the Parks Division. Provide documentation of approvals for cross checking. Insure compliance with the PBVVP.
6. Plans are too conceptual to provide an appropriate review. Several symbols are used for many trees and one symbol is used for all shrubs and ground covers which may be very different in size and character. Please provide a separate symbol for each tree and a separate symbol for each type of shrub (i.e. large evergreen shrub, medium size shrub, small flowering accent shrub, etc.) and ground covers. Final comments are reserved pending receipt of more complete plans.
7. Please identify all symbols used on the plans in the legend.
8. Invasive species shall not be added to a landscaped area. Echium fastuosum is listed as an invasive species. Please provide a substitute.
9. Please provide parkway street trees for Ponto Drive that are consistent with the PBVVP (see page 34 of the PBVVP).

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10. The PBVVP indicates that "Landscaping should enhance the quality of development by framing and softening the appearance of buildings, enhancing the overall image, screening undesirable views and providing shade and wind protection". The vision plan also indicates that "Planters and pots placed in building recesses and adjacent to blank walls are encouraged.....Planter and pot materials should complement the building architecture". "Landscaping should be in scale with adjacent buildings and be of appropriate size at maturity." Additional landscaping to include trees is needed along the west sides of the 2 center westerly buildings; the north side of the southwesterly building; and the east and west sides of the coffee bar building. Please address the above vision plan guidelines.
11. The Landscape Manual indicates that landscape plans are to feature ground cover, shrubs, and trees to screen elements of unsightliness and screen/soften new improvements. The Landscape Manual also indicates that landscaping shall be used to accentuate and enhance architecture. Please provide landscaping to include trees along the north and south sides of the northwesterly building; north side of the center westerly building; and south side of the center southerly building to both soften and enhance these elevations.
12. Please coordinate landscape plans with civil plans. Check all areas insuring coordination. Provide a copy of the latest civil plans with the next submittal for cross checking.
13. Please show and label all property lines, right-of-ways, easements and utilities on all plan sheets and insure no conflicts with landscaping. No trees are allowed within public utility easements.
14. The plan shall demonstrate that plants, when installed and at maturity, will be positioned to avoid obstructing motorists' views of pedestrian crossings, driveways, roadways and other vehicular travel ways. On collector streets and larger, landscape elements over 30 inches in height (including planting measured at maturity) as measured from adjacent street grade are not permitted at street corners within a triangular zone drawn from two points, 25 feet outward from the beginning of curves. At medium to high use driveways, the 30 inch height limitation applies at driveways 25 feet from the edge of the apron outward along the curb, then 45 degrees in toward the property. Landscape features (shrubs, trees, fencing, etc.) shall be selected to ensure that no visual impairments or obstructions are located within the CalTrans sight distance lines. Please show and label all vehicular sight lines per the above and insure no conflicts.
15. 50% of the shrubs (except on slopes 3:1 or steeper) shall be a minimum 5 gallon size. Please address.
16. Generally identify all existing woody plant material to be removed or retained. Trees over 12" in caliper diameter shall be identified on the plan individually as to caliper size and type and labeled to be retained or removed.
17. The planting plan and palette shall include tree types and quantities and shrub types and spacing with general layout. Please address.
18. Please address maintenance of all areas including the Ponto Drive median; the area within the right-of-way on Carlsbad Boulevard; and the bocce court.

19. Please review the plans with the Fire Marshall to insure no fire suppression zones are required. Provide documentation of findings for cross checking. Address any requirements as appropriate per the Landscape Manual.
20. Please address trails per the PBVVP and obtain review and approvals from Liz Ketabian in the Parks Division. Provide documentation of review and approvals for cross checking.
21. An encroachment permit is required for any enhanced paving located within the public right-of-way. Please add a note clarifying this requirement on the landscape plans and coordinate with the civil to show any enhanced paving within the right-of-way on their plans and add this same note to the civil plans.
22. The PBVVP indicates that "Trees and plants native to the Southern California coast or those which flourish in the region should be selected whenever possible." The Landscape Manual indicates that native and drought tolerant plant materials are to be incorporated whenever possible. Please address.
23. Plants in a transitional area (adjacent to native vegetation) shall consist of a combination of site adaptive and compatible native and/or non-native species, and shall conform to the requirements in Section 5 – Fire Protection Requirements. Please address.
24. All utilities are to be screened. Please locate all light poles on the landscape plans and insure that there are no conflicts with trees.
25. Please add the following bold portions of the notes to the slope re-vegetation notes on the plans:  

Slopes – 6:1 or steeper and:

  - a. 3' or less in vertical height and are adjacent to public walks or streets require at minimum Standard #1.
  - b. 3' to 8' in vertical height require Standards #1 (**erosion control matting shall be installed in lieu of a cover crop**), #2 and #3.
  - c. In excess of 8' in vertical height require Standards #1 (**erosion control matting shall be installed in lieu of a cover crop**), #2, #3, and #4.
26. Please clarify where the Marathon sod is proposed. The putting green is synthetic. Please also provide a symbol different from the paving (some of the paved areas use the same hatch symbol).
27. Please provide a conceptual sketch of the raised planter walls and indicate proposed finish materials and wall caps. Insure compatibility with the PBVVP.
28. This appears to be a part of a battered wall. Please clarify and revise planting layout as appropriate.
29. Please address landscaping of all areas.
30. Please confirm that recycled is currently available along Avenida Encinas and revise notes as appropriate to indicate the use of recycled water. Show the recycled water mainline in the street.

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Irrigation systems for all projects, except for service to a single-family residence or front yard irrigation on individually metered condos, shall be designed to use non-potable, treated recycled water, unless an exemption is approved by the City Utilities Division.

31. Please revise the note as appropriate if there is no turf.
32. Provide a colored or hatched plan clearly showing where recycled water, graywater and potable water are proposed to be used for irrigation. See comment 30 above. The plan will be forwarded to Carlsbad Municipal Water District for review. Any comments will be returned to the applicant.
33. Concept plans shall include calculations which document the maximum allowed annual water use for the landscaped area or maximum applied water allowance (MAWA) and estimated total water use (ETWU). A landscape project shall not exceed the MAWA. The MAWA for a landscape project shall be determined by the following calculation as defined in the City ordinance:  $MAWA = (ET_o)(0.62)[(0.7 \times LA) + (0.3 \times SLA)]$ . The ETWU shall be determined by the following calculation as defined in the Landscape Manual:

$$ETWU = (ET_o)(0.62) \left( \frac{PF \times HA}{IE} + SLA \right)$$

Please provide calculations and worksheets on city forms as found in the Landscape Manual. In addition to the calculations, include a statement on the plans signed under penalty of perjury by the person who prepared the plan that provides:

"I am familiar with the requirements for landscape and irrigation plans contained in the city of Carlsbad's landscape manual and water efficient landscape regulations. I have prepared this plan in compliance with those regulations and the landscape manual and agree to comply with all requirements when submitting construction documents. I certify that the plan implements those regulations to provide efficient use of water."

34. The surface area of a water feature, including swimming pools, shall be included in a high water use hydrozone and made a part of the water use calculations. Please include all water features including the spa and fountains.
35. The plan shall provide that only low volume or subsurface irrigation shall be used to irrigate any vegetation within twenty-four inches of an impermeable surface unless the adjacent impermeable surfaces are designed and constructed to cause water to drain entirely into a landscaped area.
36. Separate water service for landscaping (including, but not limited to connections, water meters, and back flow preventers) shall be provided for all commercial/industrial projects, golf courses, parks, and residential common areas in projects over four (4) dwelling units. Please address.
37. Please provide landscaping along Avenida Encinas that is compatible/consistent with existing plantings to the east to provide street scene continuity. The Poinsettia Shores Master Plan (PSMP) calls for *Podocarpus gracilior* as the dominant tree. Existing plantings to the east include *Podocarpus gracilior* and *Pinus canariensis* along with the *Washingtonia robusta*. Please note that no new



Washingtonia robusta should be incorporated as it is listed as an invasive species. Insure coordinate with the PBVVP and coastal conditions.

38. The PSMP addresses view preservation in exhibits 12 and 22 on pages 52 and 53. Please review and address.
39. **RETURN REDLINES and provide 2 copies of all plans (concept, water conservation, fire suppression; and colored water use plan) for the next submittal. Please provide a written response to all comments clearly indicating where and how each comment was addressed.**

**Engineering:**

1. LDE issues to follow under separate cover.

**Police:**

1. Please see Police Department comments in the two (2) attached letters dated April 14, 2015.

**Fire:**

1. Fire Department issues to follow under separate cover.

**Building:**

1. Please confirm required handicap parking versus required parking (Table 11B208.2 of the CBC) and revise plans where applicable.
2. A complete code review will be performed when construction drawings are submitted to the Building Division.

**Coastal Corridor Team:**

1. Coastal Corridor Team issues to follow under separated cover.

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