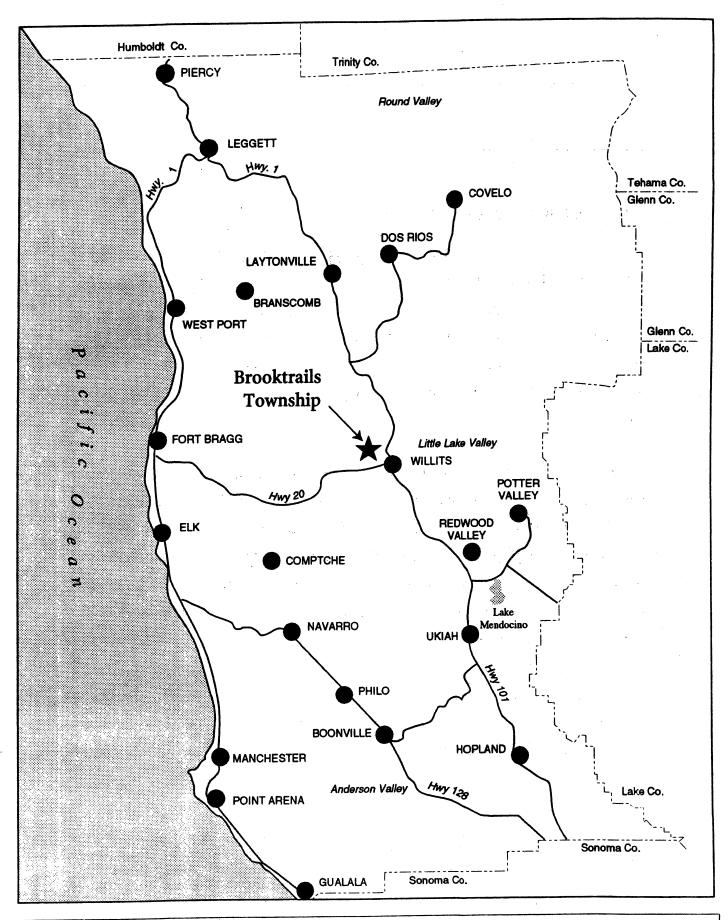
2. SPECIFIC PLAN

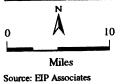
2.1 SPECIFIC PLAN ORIGINATION

Brooktrails Township is an unincorporated Mendocino County community consisting of 6,605 parcels located immediately northwest of the City of Willits (see Figure 2-1, Regional Location Map, and Figure 2-2, Site Location Map). Currently, Lake Emily and Lake Ada Rose at Brooktrails provide sufficient domestic water supply for 2,000 equivalent single-family dwelling units within the Township. However, as currently subdivided, 4,000 residential lots would not be supplied with water from existing sources.

Over the past decade, the Township Board of Directors has investigated ways to meet anticipated water needs for future growth. In 1981, the Township retained a consulting team to prepare an analysis of three alternative dam sites. Eight years later, the Township initiated preparation of the Willits Creek Reservoir Project Draft Environmental Impact Report (EIR). The Willits Creek Reservoir was a proposed 2,400 acre-foot impoundment, considered by the Township sufficient in size to allow buildout of the Township. The Draft EIR was completed and issued for agency and public review in July, 1991. However, through the review process, given existing environmental constraints of steepness of slope, slope stability, habitat, access and other community development issues, it became apparent that the size and cost of the reservoir would ultimately depend on how many residential units would, or could, actually be constructed

^{1.} Water at Brooktrails is measured according to SFRs, or Single Family Water Usage Units, which is the average water usage rate of a full-time, occupied single family residential unit. Up to 1993, it was thought that an additional water source would be necessary to provide for development at Brooktrails over 1,330 connections. However, on January 12, 1994, based on a technical analysis performed for the District regarding the available water supply to Brooktrails, the California Department of Health Services, Office of Drinking Water, amended Domestic Water Supply Permit No. 82-020 to allow the District to serve up to 2,000 service connections.





BROOKTRAILS TOWNSHIP SPECIFIC PLAN

Figure 2-1
Regional Location Map

within the Township.

Through the process of addressing comments on the scope and content of the EIR by various regulatory agencies and the public, the Township Board of Directors recognized that a community plan was necessary to address Township development potential and land use and environmental concerns to allow for a better understanding of the costs and impacts associated with the proposed Willits Creek Reservoir project. Accordingly, after several years of effort, the Township obtained legislation by the State legislature, and Township voter approval, authorizing the District to become the first special district in California to engage in land use planning decision-making. Mendocino County Ordinance No. 3829 adopted by the Board of Supervisors on August 18, 1992, established the Brooktrails Township Community Services District as the Brooktrails Area Planning Commission (planning authority granted by the State of California as delegated through Mendocino County), and noted it was the "function and duty" of the Planning Commission to prepare a Specific Plan pursuant to Section 65450 of the California Government Code and related General Plan amendments. This Specific Plan is the result of that legislation (does not include the Spring Creek and Sylvandale subdivisions).²

^{2.} Spring Creek and Sylvandale are both subdivisions which were annexed to the District. The District provides water service, recreation and fire protection services to the Spring Creek subdivision and recreation and fire protection services to the Sylvandale subdivision. Both subdivisions have associations and have been active in the community planning process. The residents of both subdivisions have expressed concern over the years as to the possibility that the District's efforts to provide rules and regulations for Brooktrails proper might result in unanticipated consequences in the two subdivisions where conditions are perceived by residents to be substantially different. The District Board has expressed its intent to refrain from preparing planning studies which would relate to land use and criteria by which development would proceed in the Spring Creek and Sylvandale subdivisions.

Ordinance 3829 excluded the Spring Creek and Sylvandale subdivisions from the area to be covered by the Specific Plan. The Specific Plan will not operate to change land use or existing standards and criteria by which development is undertaken in these two areas. Included in the planning process as it relates to the two subdivision are the distribution and extent of Greenbelt and the distribution of infrastructure and other essential facilities such as fire fighting and prevention facilities.

2.2 PURPOSE OF SPECIFIC PLAN

A Specific Plan, as its name implies, is a detailed plan for the development of a specific area. The *Brooktrails Township Specific Plan* is the first Specific Plan to be prepared for the Township and forms a new beginning for the Township as a whole. This Plan represents the culmination of a planning concept that first surfaced approximately four years ago, and is the result of a community planning effort conducted over approximately three years. It has been prepared in an attempt to address numerous issues and concerns with respect to Brooktrails Township which have arisen over the past few years, related primarily to the quality and character of new development, the sequencing of community facilities and infrastructure, environmental protection and enhancement, public safety, recreation and related issues.

The purpose of this Plan is to provide for the orderly and systematic development of the Township in a method generally consistent with the *Mendocino County General Plan*. It encompasses the elements of the *Mendocino County General Plan* into a more refined document which focuses on the development of the Township property in particular. The Specific Plan establishes more specific goals, policies and conditions for the development of the Township. The Plan provides for the development of 4,940 acres of the Township, including greenbelt area, in a community consisting of primarily residential and public open space preserve land, with some commercial land uses, while observing and incorporating the environmental characteristics, opportunities and constraints inherent within the Planning area and surroundings. This Specific Plan has been prepared in accordance with the requirements set forth in California Government Code Section 65451.

A Specific Plan is a policy or regulatory tool used to guide community development. Specific Plans may be adopted either by resolution or ordinance. This allows cities and counties to choose whether their specific plans will be policy-oriented (adopted by resolution), regulatory (adopted by ordinance) or both. Because this Specific Plan essentially provides more detailed policy guidance, it is a "policy" level plan and is adopted by resolution. The notable exception is Section 10.2 of Chapter 10, *Community*

Design, which addresses site development standards. Because Section Two of Chapter 10 establishes site development standards, this portion of the Specific Plan is "regulatory" and is adopted by ordinance and becomes part of the County Zoning Ordinance.

Because the Township is in an unincorporated area of Mendocino County, the Specific Plan will provide a bridge between the County's General Plan and future development within the Township in a more specific manner than is possible under the current Development Review procedures and community-wide zoning ordinance. The Specific Plan will also have implications for the provision of, and budgeting for County roads and community services, inclusive of utilities, fire protection and other functions and activities.

As further example, a Specific Plan can, as implemented, amend zoning ordinances to create more appropriate land use or density designations; address specific area concerns, such as hillside development; and can serve as a basis for other community planning policy such as the conservation of natural resources potentially affecting quality of life issues in a single package tailored to particular land uses in a specific geographic area. The passage of zoning amendments, such as a hillside zoning ordinance, is the responsibility of the County of Mendocino. BTCSD can develop and propose an ordinance for consideration by the County. Additionally, it should be made clear that the District would be responsible for implementation of the ordinance consistent with related items included in the mitigation monitoring program included as part of the EIR adopted for the Specific Plan. For the Township, the Specific plan process concludes with a new plan for Brooktrails and an Environmental Impact Report (EIR) for that plan. Under the California Environmental Quality Act, the Specific Plan is regarded as a "project," and allows for the formulation of specific mitigation measures to reduce environmental impacts which are factored into the Specific Plan for implementation.

The Brooktrails Township Specific Plan will serve as a comprehensive planning document for the Township as it continues to grow. It includes development goals and policies, land use regulations, a capital improvement program and an overview of financing measures. It integrates land use controls that replaces the existing Development Review Board Ordinance and Interim Site Development Standards.

In summary, this Specific Plan is intended to provide a comprehensive set of plans, guidelines, regulations and implementation program for guiding and ensuring the orderly development of the Township Planning area and processing development applications in accordance with the land use plan contained in this document. Implementation of the Plan involves commitments to public and private improvements as well as to site-specific developments consistent with the Plan Goals and Policies for implementation. The overall goals and policies for Specific Plan implementation provide the rationale for the development regulations found herein. As set forth by state law, it establishes the objectives and goals to guide the location, intensity and character of land uses, the circulation pattern and necessary infrastructure improvements, the organization and design of the Township, and the implementation actions required to realize Plan recommendations.

2.3 SCOPE OF SPECIFIC PLAN

As noted previously, Specific Plans provide a greater level of specificity in the planning and development of projects and development sites of special interest or value to a community or region than does a General Plan. As required under California law, Specific Plans are to contain the following:

- (a) ... a text and diagram or diagrams which specify all of the following in detail:
 - (1) The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan.
 - (2) The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.
 - (3) Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
 - (4) A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).

(b) ... a statement of the relationship of the specific plan with the general plan.

In addition to the items noted above, this Specific Plan also addresses environmental resources, public safety and community design. The Specific Plan contains numerous goals and implementing policies with respect to the following chapters: Chapter 4, Land Use and Planning; Chapter 5, Housing and Commercial Development; Chapter 6, Environmental Resources; Chapter 7, Community Facilities and Services; Chapter 8, Public Safety; Chapter 9, Cultural Resources; and Chapter 10, Community Design. These chapters contain the specific goals and implementing policies germane to each topical area pertaining to the distribution, extent and intensity of Plan components, and provide explanations of how the goals and policies manifest themselves in the Plan. These chapters also provide written descriptions and diagrams of planned components and improvements that support the Plan proposals, including circulation, water, sewage, redevelopment and the protection of existing natural resources of vegetation and wildlife, hydrology and water quality, soils, and noise and air quality, all of which define the relative quality of life to be found within the Township by residents and property owners.

Details regarding implementation of the Specific Plan goals and policies and Specific Plan administration are provided in each chapter. The *Capital Improvements and Financing Program* (Chapter 11) provides estimated costs of the public works projects, describes measures by which each public works project will be financed, and identifies those responsible for financing and carrying out each improvement. The discussion on financing measures outlines financing measures necessary for implementing the Specific Plan proposals other than capital improvements, such as the acquisition of property development rights, and describes the items in need of future financing, estimated costs, how they will be financed and those responsible for financing.

The discussion on *Specific Plan Implementation and Administration* (Chapter 12), identifies the regulations and/or ordinances that must be adopted or amended to implement the Specific Plan. Chapter 12 also describes state, county and Township requirements for amendments, development review procedures, and actions by the Township Board of Directors, and documents those projects and/or implementation

measures and mechanisms that will/will not be exempt from additional environmental review. The Appendices provides summaries of key Specific Plan background data as necessary and the Specific Plan EIR list of mitigation measures.

The development goals and policies are based on social and environmental issues discussed on previous occasions by community residents. The development goals and policies are also based on existing environment constraints to development and construction, issues raised in correspondence (including the EIR Notice of Preparation), many of which pertain to the distribution, location and extent of land uses. The text includes a Zoning map and written description of the Specific Plan features, the characteristics of each Plan land use designation, standards by which development will proceed, and criteria for environmental resource conservation.

2.4 BASIS OF SPECIFIC PLAN

In December, 1993, the District formed a Community Vision Focus Group consisting of 15 individual property owners. The purpose of the Focus Group was to develop a community vision statement and provide recommendations to the Board of Directors regarding growth within the Township. In addition, the Focus Group was charged with the responsibility of preparing and recommending to the Board various mechanisms and procedures in which the Vision could best be realized.

Board Resolution No. 1993-36 (adopted November 16, 1993), stated the following with respect to the Community Vision Focus Group:

"Purpose:

- "(1) to assemble a group of influential Brooktrails property owners (stakeholders) that represent the full spectrum of property owners and challenge them to develop a community vision statement;
- "To Create a forum for discussing, debating and reaching agreement about growth issues and other planning goals that are an inherent part of the vision;

• "To obtain the support or 'buy in' of the community in the vision statement that serves as the basis for the specific plan, so that all subsequent planning is based on and reflects the concerns of the community; the specific plan becomes the community's plan, rather than one formulated by outside consultants."

The result was the *Community Vision Focus Group Report and Recommendations*, June, 1994. The Vision Statement, contained in the Focus Group Report and as amended and adopted by the Board of Directors is reproduced at the beginning of this Specific Plan.

Please note that an important component of the Community Vision Focus Group Report was Chapter 3, entitled *Proposed Overall Goals and Objectives*, which contained a series of proposed goals and objectives directed toward implementing the Vision Statement. At its regularly scheduled meeting of December 20, 1994, the Board of Directors reviewed and revised the *Proposed Overall Goals and Objectives*, as recommended by the Community Vision Focus Group, to be considered in developing the Specific Plan.

Thus, the Vision Statement and *Preliminary Overall Goals and Objectives* as adopted by the Brooktrails Board of Directors form the foundation on which the Specific Plan goals and implementation policies are based. The various Chapters (Chapter 4, *Land Use and Planning*, Chapter 6, *Environmental Resources*, etc.), contained in the Specific Plan as described previously (see Section 2.3, Scope of Specific Plan), are designed to implement the many goals and objectives as approved by the Board of Directors. Accordingly, to facilitate understanding and use of the Specific Plan, each adopted statement (goal or objective) is referenced as to the page number in this Specific Plan where each is discussed and implemented. The adopted *Preliminary Overall Goals and Objectives*, are thus reproduced in their entirety (Table 2-1), along with the location in the Specific Plan where each is discussed.

		Discussion Page	
1.0 LAND USE			
Environmental Stewardship			
1.1	Environmental stewardship shall be the primary goal for land use and planning.	6-1	
1.1.1	Environmental protection of land, air, water, soil, and wildlife and fisheries habitat.	6-1	
1.1.2	Prohibition of projects within the riparian corridor.	6-1	
1.1.3	Development and implementation of the "Redwood Park Management Plan."	6-2	
1.1.4	Promotion of volunteer environmental stewardship programs, such as the Earth Day Street Clean-up, "Adopt A Block" program, and additional public awareness.	6-2	
Zoning			
1.2	Zoning shall be predominantly single-family residential.	4-10	
1.2.1	Revision of existing land use map to conform to the Specific Plan.	4-14	
1.2.2	Clarification of the zoning and extent of the developed commercial areas; consider designation of other necessary commercial areas.	4-13	
1.2.3	Downzoning of all remaining commercial neighborhood zoning parcels to single or two-family residential, as appropriate.	4-14	
1.2.4	Downzoning of all vacant parcels that are zoned multi- family to single or two-family residential, as appropriate.	4-14	
1.2.5	Participate with Willits in the land-use planning of the Ells Field Airport in coordination with the City of Willits as a part of the Specific Plan.	4.17	
Redevelopment			
1.3	Future development shall adhere to the needs of the community, natural environment and growth goal and objectives.	4.18	

	Discussion Location				
Redevelopment (cont'd.)					
1.3.1	Encourage the private development and enhancement of the Brooktrails Lodge in a manner that would utilize the motel, cottages, and restaurant for local residents and non-resident property owners. Such development should be compatible with historic levels and types of use.	4-18			
1.3.2	Encourage the renovation and operation of the Brooktrails Lodge recreation area that includes the swimming pool, tennis courts, and picnic grove.	4-19			
1.3.3	Explore all reasonable financing options from all sources including bonds, benefit assessments, and grants.	4-22			
1.3.4	Meet mandated moderate income housing requirements in an environmentally sensitive manner.	5-1			
1.3.5	The Township should set up a process to receive donated lots in exchange for tax incentives.	6-20			
1.3.6	Explore private development of a facility for seniors within Brooktrails that would allow seniors who do need extra care, to live within the Township in exchange for trading in their lot.	4-19			
1.3.7	Being aware of the desires of non-resident property owners to enjoy Brooktrails; encourage the development of recreational amenities consistent with the vision; and the scale and character of existing development within the community.	7-24			
Future 1	Future Planning				
1.4	In addition to the Specific Plan process, evaluation and data collections shall be ongoing.	4-20			
1.4.1	During the Specific Plan process, provide for any gap between the expired CC&Rs and the Specific Plan where needed.	Section 10			
1.4.2	Provide the continuous collection of environmental data, conduct periodic analysis and prepare an Annual State of the Environment Report to the BTCSD Board of Directors with recommendations.	4-20			
1.4.3	Provide the continuous collection of planning data, conduct periodic analysis, and prepare an annual Planning Report to the BTCSD Board of Directors with recommendations.	4-20			
1.4.4	Evaluate compliance with Specific Plan annually.	4-20			

Relationship to Surrounding Jurisdictions				
1.5	Brooktrails Township shall seek to strengthen relationships with neighboring communities and jurisdictions.	4-21		
1.5.1	Actively seek to participate with the City of Willits and others to effectively and efficiently cooperate in providing public services to our communities.	4-21		
1.5.2	Ensure proportionate share of county services and funding opportunities.	4-21		
2.0 HYD	DROLOGY AND WATER QUALITY			
2.1	Ensure existing and future development does not degrade water quality or cause sedimentation of District creeks and reservoirs.	6-16		
2.2	Protect our existing water supply by controlling future building and road development around lakes, creeks and other water sources, using eminent domain, if necessary.	6-16		
2.3	Establish a recycling program for hazardous waste so that such materials do not find their way into the water supply.	7-16		
2.4	Protect the Willits Creek watershed. Stabilize stream banks with vegetation and other low impact restoration techniques and dredge Lake Emily, as needed.	6-16		
3.0 BIOI	LOGICAL RESOURCES			
3.1	Protect and enhance botanical resources including native plants, trees, and wild flowers. Create an inventory of location of rare or endangered plants.	6-10		
3.2	All brush reduction and fire abatement programs should be consistent with ecosystem and forestry management.	7-15		
3.3	Establish a Brooktrails subdivision-wide tree cutting policy. Trees shall not be harvested for the primary purpose of obtaining revenue.	6-11		
3.4	Create a heritage tree ordinance that protects certain trees and groves.	6-11		
3.5	Encourage native landscaping and avoidance of allergy-producing plants. Protect and expand use of flowering native plants and wild flowers.	6-11		
3.6	Ensure the survival and longevity of native wildlife and habitat.	6-10		

	Discussion Location	
3.7	Manage the deer population to be in balance with the ecosystem. Discourage feeding of all wild animals.	6-12
3.8	Encourage the re-establishment and maintenance of a healthy salmon and steelhead population and spawning environment. Improve bass population in lakes.	6-14
3.9	Encourage preservation and enhancement of Beeler Pond as a neighborhood ecological park, and maintain small pond biological life.	6-14
3.10	Establish more stringent barking and loose dog controls. Enforce leash laws.	6-13
4.0 VIS	UAL QUALITY AND AESTHETICS	
4.1	Preserve the natural character of the subdivision to the extent feasible through appropriate zoning ordinances and design standards for all housing, commercial, and other uses.	6-8
5.0 NOI	SE, LIGHT, AND AIR QUALITY	
5.1	Establish a zoning and project approval process in cooperation with the City of Willits to control the type of businesses developed at the airport, in an effort to maintain our superior air quality and ensure appropriate use.	6-21
5.2	Minimize light pollution. Minimize the nuisance of light to neighbors. Encourage residents to shade outdoor lighting to prevent light from entering roadways to avoid creating a hazard. Some major intersections may need lighting for traffic safety purposes.	6-9
5.3	Minimize noise pollution. Establish limits on electronically amplified sources (auto, household, and portable).	6-22, 6-23
6.0 PUB	LIC SERVICES AND UTILITIES	
6.1	Support and maintain fire protection, ensure adequate police protection, and ambulance service. Improve emergency response time of ambulance to Brooktrails residents.	7-15
6.2	Research and upgrade existing treated water storage facilities with best available technology, consistent with fiscal responsibility.	7-18

6.3	Promote conservation through use of: •water saving devices •incentive rates •automated monitoring	7-19
6.4	Maintain existing public infrastructure investment through the Five Year Capital Improvement Plan and budget.	7-21
6.5	Charge appropriate fixed fees for fire, water, sewer and capital improvements for developed and vacant parcels on an equitable basis.	7-22
7.0 TR	ANSPORTATION AND CIRCULATION	
7.1	Improve access.	7-4
7.1.1	Improve Sherwood/Birch intersection.	7-7
7.1.2	Improve Sherwood Road.	7-7
7.1.3	Construct a second access consisting of a two-lane road from Brooktrails to Highway 20.	7-4
7.1.4	Update Evacuation Plan, improve emergency egress roads, and increase public awareness. Formalize property agreements for emergency access use.	8-2
7.1.5	Improve emergency access along the entire length of Ridge Road from Iris to Goose; improve other emergency access routes.	7-11
7.1.6	Build a trail to Willits for walking and bicycling.	7-7, 7-9
7.1.7	Promote unsubsidized MTA service to Brooktrails.	7-12
7.1.8	Recognize need for Willits Bypass.	7-12
7.1.9	Develop improved airport access.	7-9
8.0 REC	CREATION	
8.1	Develop a BTCSD Recreation Plan and fund an associated budget to initiate and maintain said recreational activities/facilities to include: (a) par course maintenance (b) trail system (c) vista points (d) community center (e) Summer Lake improvements (f) Chapter 3 of the Redwood Park Master Plan For swimming pool, tennis courts, lodge, etc., see redevelopment goals and objectives under Land Use.	7-24

2.5 RELATIONSHIP TO JURISDICTIONS AND PLANS

General

While the Specific Plan addresses Brooktrails proper, the area to be considered for planning purposes includes those lands within and adjacent to the Township that could reasonably be expected to be influenced by growth within the Township up to, and including, buildout. Therefore, the implications of potential growth within the Township as related to unincorporated lands surrounding the Township and nearby City of Willits are considered in this Specific Plan, inclusive of traffic, utilities, public services and other subject areas.

Mendocino County

This Specific Plan is structured to implement the provisions of the *Mendocino County General Plan* by creating a bridge between broad based General Plan policies and specific social, physical and environmental characteristics of the Brooktrails Township. *The Mendocino County General Plan*, as revised, was adopted by the Mendocino County Board of Supervisors on April 26, 1993, and sets forth the general guidelines for orderly growth and development within unincorporated areas of Mendocino County. It also provides direction for zoning, subdivision regulations, intensity of development, land use and the design of public facilities.

This Plan is a refinement of the basic development goals and policies of the General Plan. It establishes more detailed and specific goals and policies for development of the Township. A definitive description of the relationship of the Specific Plan to the provisions of the *Mendocino County General Plan* is provided in Chapter 13, *Relationship to Mendocino County General Plan*.

City of Willits

The Township is located approximately 1 mile northwest of the City of Willits, which has a population of 5,300 residents. The City of Willits is an incorporated area of 2.8 square miles, and is recognized in the City's General Plan as a subregional commercial

and industrial center, serving a market area of about 15,000 people. The City's location along the U.S. Highway 101 growth corridor suggests that Willits is increasingly linked to the growing San Francisco Bay Area, particularly with regard to the emerging employment center in and around the City of Santa Rosa in Sonoma County.

The City of Willits General Plan revision, adopted by the Willits City Council on August 12, 1992, stresses the creation of a self-sustaining community with a balance of jobs and housing, and the retention of a small town character which is reflected in the design of its residences, commercial buildings and public open space, in lieu of what could otherwise be perceived as a residential bedroom community. The Willits General Plan recognizes the presence of the Township, and recognizes the potential for growth and an increased population base within the Township. Correspondingly, growth within the Township under buildout conditions, would be expected to affect the City of Willits, particularly with respect to traffic increases, commercial/office space use, and increased demands on sewage treatment facilities. Correspondingly, this Plan considers these potential impacts on the City of Willits resulting from growth within the Township itself, and contains features to mitigate these potential impacts.

Chapter 2 of the Willits General Plan Technical Appendices Background Reports makes special reference to the Township's growth and development. The views expressed are those of the General Plan Background Report preparers, not necessarily adopted by the City Council. However, the Background Report material does provide a perspective on the general concerns respecting growth in the Township when the Willits General Plan Revision 2020 was prepared. Section 2.260 of Background Report 2.000, Summary of Issues and Suggested Planning Approach, is provided for informational purposes and states:

"...The level of future development which occurs in Brooktrails Township will have an influence on the nature, extent and location of future development in Willits."

"In some respects, it is the in the interest of the City for Brooktrails Township to overcome its growth constraints. The

City's high dependence on sales tax revenue makes Brooktrails growth desirable in order to maintain and improve local services and infrastructure. Similarly, efforts to promote downtown revitalization would benefit from additional development within Brooktrails. Perhaps most importantly, residential growth which occurs at Brooktrails does not require the same level of local government services as do homes built within the City limits. This enables the City to enjoy many of the revenue benefits of urban growth without paying all of the service costs. For these reasons, the City may wish to consider efforts to assist Brooktrails in overcoming its infrastructure constraints. At the same time, however, Brooktrails Township must recognize that its future growth will have an impact on Willits, particularly with regard to traffic. Mitigation of traffic impacts on Willits should, therefore, be a component of all proposals to remove Brooktrails infrastructure constraints."

The Specific Plan addresses the issues noted in the above paragraph, including potential traffic impacts.