

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071



Filed: 05-15-98
49th Day: 07-03-98
180th Day: 11-11-98
Staff: RMR/LB *RMR*
Staff Report: 09-14-98
Hearing Date: October 13-16, 1998
Commission Action:

STAFF REPORT: REGULAR CALENDAR

APPLICATION NO.: 5-98-208

APPLICANT: Frank P. Montesinos

AGENT: Paul Mejos

PROJECT LOCATION: 1801 N. El Camino Real, San Clemente, Orange County

PROJECT DESCRIPTION: Construction of a 45 foot high, 27 unit time-share building with 9,350 square feet of retail and 116 parking spaces. Grading consists of 15,200 cubic yards of cut and 550 cubic yards of fill.

Lot area:	33,740 sq. ft.
Building coverage:	31,865 sq. ft.
Pavement coverage:	2,125 sq. ft.
Landscape coverage:	Planters
Parking spaces:	116
Zoning:	C-2
Plan designation:	MU-3
Project density:	35 du/ac
Ht abv fin grade:	45 feet

LOCAL APPROVALS RECEIVED: Approval in Concept from the Community Development Department of the City of San Clemente

SUBSTANTIVE FILE DOCUMENTS: City of San Clemente Certified Land Use Plan, Geotechnical Report prepared by Geo-Etka, Inc. on June 12, 1998, Geotechnical Response to City Concerns dated 1996 by Peter and Associates, Letter from Peter and Associates to Coastal Commission Staff dated August 3, 1998, City Council Minutes of September 4, 1996 for 2-year extension of TTM/CUP, Resolution 96-62 approving a time extension for TTM 14486/SPR 91-08/ CUP 91-09

STAFF NOTE:

This project was submitted to the South Coast Office of the Coastal Commission on May 15, 1998. The 30 day review period passed and the project was deemed filed. However, on June 26, 1998 staff sent the applicant a letter requesting the staff report and minutes of the City Planning Commission, a geotechnical report, grading quantities, and parking studies. The information requested was supplied on July 3, 1998. On July 16, 1998 staff reviewed the materials submitted by the applicant and sent out a letter requesting further information on the issue of potential flooding which was raised by the City and contained in the material supplied by the applicant on July 3, 1998. This information was supplied on July 24, 1998.

By the time the applicant submitted the materials on July 24, 1998 it was too late to agendize the project for the August hearing. However, the two-year extension from the City of San Clemente for Tentative Tract Map 14486, SPR 91-08 and CUP 91-09 was due to expire on September 4, 1998. Staff informed the applicant in the July 24, 1998 letter that it would not be possible to agendize the project on the August calendar and that the applicant should seek a time extension from the City.

Regardless of whether the local approvals have expired or not, the application must go forward to hearing as per the Permit Streamlining Act or be withdrawn by the applicant. The 180 day deadline under the permit Streamlining Act is November 11, 1998.

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends the Commission approve the proposed development with a special condition regarding conformance with geologic recommendations. There are no known issues of controversy or unresolved issues.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. Approval with Conditions

The Commission hereby grants a permit for the proposed development, subject to the conditions below, on the grounds that, as conditioned, the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal program conforming to the provisions of Chapter 3 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. Special Conditions

1. Conformance with Geotechnical Recommendations

Prior to the issuance of the coastal development permit, the applicant shall submit, for the review and approval of the Executive Director, grading, foundation and basement plans. The approved plans shall include plans for the foundation, retaining walls, subdrains and footings. These plans shall include the signed statement of the geotechnical consultant certifying that these plans incorporate the recommendations contained in the geotechnical investigation reviewed by Peter and Associates in 1996 and the letter dated August 3, 1998.

The approved development shall be constructed in accordance with the plans approved by the Commission. Any deviations from said plans shall be submitted to the Executive Director for a determination as to whether the changes are substantial. Any substantial deviations shall require an amendment to this permit or a new coastal development permit.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description

The proposed development involves the construction of a 45 foot high, 27 unit time-share building with 9,350 square feet of retail and 116 parking spaces. Grading consists of 15,200 cubic yards of cut and 550 cubic yards of fill.

The proposed building consists of four levels with a basement. The basement level is 24,830 square feet with a total of 61 parking spaces. The first floor (street level) is a split level containing 55 parking spaces (25,130 square feet) and 8,420 square feet of retail at street level. The second level consists of 18,000 square feet of timeshare units, 930 square feet of food retail, private patio area, and courtyard. The third level consists of 11,660 square feet of timeshare units. The fourth level consists of 2,950 square feet of timeshare. There are a total of 27 proposed units (1, 2 and 3 bedroom units) with a total square footage of 32,620 square feet. There are 8 one-bedroom units, 9 two-bedroom units, and 10 three-bedroom units. Total retail and food space is 9,350 square feet. The total building area excluding parking is 32,620 for time-share units and 9,350 for retail space or 41,960 square feet. The total parking area is 49,960 square feet. The applicant is proposing a total of 116 parking spaces: 60 for the timeshares, 35 parking spaces for retail, and 10 parking spaces for food service. Another 11 parking spaces will be given over to the City of San Clemente.

The site is located in the North Beach area of the City of San Clemente at the northwest intersection of Avenida Pico and El Camino Real. The site is located adjacent to a major storm drain channel, which wraps around behind the site. The Segunda Deshecha storm drain channel is a regional flood control facility managed by the City of San Clemente and the County of Orange. The area north and west of Avenida Pico and east of El Camino Real is the vacant 250 acre Marblehead Coastal site. Commercial/retail development is located along both sides of El Camino Real inland from the municipal parking lot at North Beach. The North Beach area contains the Metrolink station, a major beach access point, the municipal parking lot, and the Ole Hansen Beach Club. The project site is not located between the sea and the first public road.

B. New Development

Section 30250 of the Coastal Act states in part:

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

Section 30252 of the Coastal Act states:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development. (emphasis added)

The proposed development is located in the North Beach Study Area of the City of San Clemente. The site is located at the northwestern intersection of Avenida Pico and El Camino Real. Development along El Camino Real is primarily commercial and retail. The site is adjacent to the vacant 250 acre Marblehead Coastal site.

The site is located near two major arterials, El Camino Real and Avenida Pico. Avenida Pico goes northeast from the site to the Interstate 5. To the northwest, El Camino Real parallels the ocean and links the City of Dana Point with the City of San Clemente. East of the site, El Camino Real is the major arterial leading to the downtown area of San Clemente.

The site is currently vacant and does not contain sensitive coastal vegetation. The site is not located between the sea and the first public road and does not, therefore, provide access to the ocean. The site is across from the North Beach municipal parking lot across El Camino Real. Neither does the site obstruct or interfere with views of the ocean from El Camino Real.

The site is zoned as C2, General Commercial. The Land Use designation is Mixed Use. Table 3-1 of the certified land use plan describes the principal permitted uses:

The mixed use zones allow a combination of commercial uses with residential units allowed on upper floors.

The proposed development conforms with the land use in that there is commercial/retail on the street level and residential uses on the upper floors.

The site is included in the North Beach Study Area. The zoning for the North Beach Study Area was not updated to reflect the City's new zoning code designations which were submitted in the Implementation Plan portion of the LCP which was approved by the Commission 4-10-98. This plan has not yet been adopted by the City of San Clemente.

The major issue of concern to the Commission in the North Beach area is public access, i.e., ensuring that beach parking at the popular North Beach area is not compromised by development.

The applicant is proposing to provide a total of 116 parking spaces, 60 for the timeshares, 35 parking spaces for retail, and 10 parking spaces for food service. Another 11 parking spaces will be given over to the City of San Clemente.

City of San Clemente Parking Guidelines:

According to the City's parking guidelines the applicant is required to provide 41 parking spaces for the timeshares (27 units X 1.5 spaces/unit). The applicant is also providing 5 guest spaces and 14 spaces for employees. For the 8,240 square feet of retail the applicant is required to provide 29 parking spaces (1 space per 300 square feet). The applicant also would provide 10 parking spaces for 600 square feet of dining area (40 total seats and 1 space per each four seats). For the retail and food areas the applicant is providing a total of 45 parking spaces or six more than is required. The remainder of the parking spaces will be allotted to the City of San Clemente.

Coastal Commission Parking Guidelines:

The parking guidelines for the Coastal Commission are contained in the Orange County Regional Interpretive Guidelines. The parking requirements for multiple-family-residential in the guidelines are 2 spaces for each dwelling unit and 1 guest space per 7 units. This amounts to 54 parking spaces for residents and 4 parking spaces for guests for a total of 58. The applicant is providing 60 parking spaces at the street level garage for the timeshares or two more than is required by the guidelines.

In the City of San Clemente the Commission has adopted the restaurant parking guidelines, i.e., one parking space per four seats. The applicant has indicated that there will be 40 seats and thus 10 parking spaces are to be provided. For general retail the Commission's guidelines call for 1 space per each 225 square feet. The applicant will be providing 8,420 square feet of retail space. At one space per each 225 square feet the applicant would need to provide 37 parking spaces. The applicant is providing 29 parking spaces which would be deficient by 8 parking spaces. However, Commission approved, with suggested modifications, the Implementation Plan which would allow retail parking at 1 space per 300 square feet. The Commission is using the parking guidelines in the Implementation Plan as guidance. Therefore, the Commission determines that the parking provided by the applicant for the retail is adequate.

Conformance with Coastal Act Finding:

As regards parking, therefore, the Commission finds that the parking proposed by the applicant with this submittal is consistent with the Commission standards and will not have an adverse impact on coastal access and beach parking. Therefore, the Commission finds that the proposed project is consistent with Sections 30250 and 30252 of the Coastal Act.

C. Geologic Stability

Section 30253 of the Coastal Act states in part:

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

The proposed development is not located on a coastal bluff or a coastal canyon. However, the site is located adjacent to a County of Orange storm drain channel. During the winter of 1993 several structures on El Camino Real opposite of the development site were damaged by flooding and later demolished. The minutes and other materials submitted by the applicant included several letters from the City of San Clemente concerning potential flooding at the site. A letter dated May 29, 1991 states:

As the plans indicate, the Gallery project has underground parking facilities at basement level below El Camino Real and if inundated with storm water and debris, it could result in damage to property, public health and welfare.

The City then attached a condition requiring the applicant to prove that the pad and underground structure are protected from the 100-year flood.

Based upon this information staff informed the applicant that the Commission could not make a finding that the proposed development conformed with Section 30253 of the Coastal Act unless the applicant provided evidence that the site was safe from flooding. The applicant then submitted an analysis from Peter and Associates dated March 14, 1996. In this document the concerns of the City are again stated:

The El Camino Real undercrossing was upsized since the original approval of your project. However, the trapezoidal channel upstream from the undercrossing is not designed to carry a 100 year storm. You will need to have your engineer provide an analysis of the impacts and mitigations if the channel overflows in a 100 year storm.

In response to this, Peters and Associates (1996) wrote:

The existing flood control channel was hydraulically analyzed by our staff civil engineer. It was determined the channel has a discharge capacity of 10,533 cubic feet per second, which is greater than the 100 year design discharge of 6,250 cubic feet per second recommended by the County of Orange Flood Control Division.

In addition, the applicant submitted a letter from Peter and Associates dated August 3, 1998 responding to the possibility of flooding. This letter states in part:

There is no chance of flooding at the subject site.

In addition, the consultants discussed the previous problems with flooding of the box culvert under El Camino Real.

The second concern, possible reoccurrence flooding to the property caused by the under-capacity box culvert at El Camino Real Highway is no longer an issue. The box culvert at El Camino Real has been replaced with a new box culvert based on the County of Orange Flood control criteria. The new box culvert is sufficient to discharge 100-year storm waters.

Based upon the Peter and Associates March 14, 1996 and August 3, 1998 letters clarifying that the proposed development is not at risk during a 100 year flood, the Commission can find that the proposed development is not at risk during a flood event and does conform with Section 30253 of the Coastal Act.

The applicants submitted a geologic update report dated June 12, 1998 by Geo-Etka, Inc., a geotechnical report prepared March 23, 1988 by Kenneth G. Osborne & Assoc., and an analysis of potential flood conditions by Peter and Associates on March 14, 1996. The original geotechnical report was prepared for a project involving the construction of a 71-unit, 4-story motel with a subterranean parking level. The geotechnical report included subterranean investigations, site reconnaissance, and laboratory testing of sub-surface materials. The geotechnical report concludes:

It is the opinion of this office that this site is suitable for the construction of the proposed development provided recommendations contained in this report are followed.

The recommendations regarded the installation of support pilings, overexcavation and construction of a compacted fill pad, foundation design, retaining walls and grading. The geotechnical update report prepared by GEO-ETKA validates the recommendations contained in the earlier geotechnical report by Kenneth Osborne & Assoc. Therefore, the Commission finds that applicant shall supply foundation plans reviewed and approved by the consulting engineers. Only as conditioned does the Commission find that the proposed development is consistent with Section 30253 of the Coastal Act.

D. Local Coastal Program

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act.

The Commission certified the Land Use Plan for the City of San Clemente on May 11, 1988, and certified an amendment approved in October 1995. On April 10, 1998 the Commission certified with suggested modifications the IP portion of the Local Coastal Program. The local government has not adopted the Commission's suggested modifications and has until October 10, 1998 to approve the suggested modifications. Therefore, the LCP is not fully certified. As conditioned,

the proposed development is consistent with the policies contained in the certified Land Use Plan. Therefore, approval of the proposed development will not prejudice the City's ability to prepare a Local Coastal Program for San Clemente that is consistent with the Chapter 3 policies of the Coastal Act as required by Section 30604(a).

E. Consistency with the California Environmental Quality Act (CEQA).

Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the geologic stability policies of the Coastal Act. Mitigation measures; a special condition requiring conformance with geologic recommendations, will minimize all adverse effects. As conditioned, there are no feasible alternatives or feasible mitigation measures available, beyond those required, which would substantially lessen any significant adverse effect which the activity may have on the environment.

Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified effects, is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

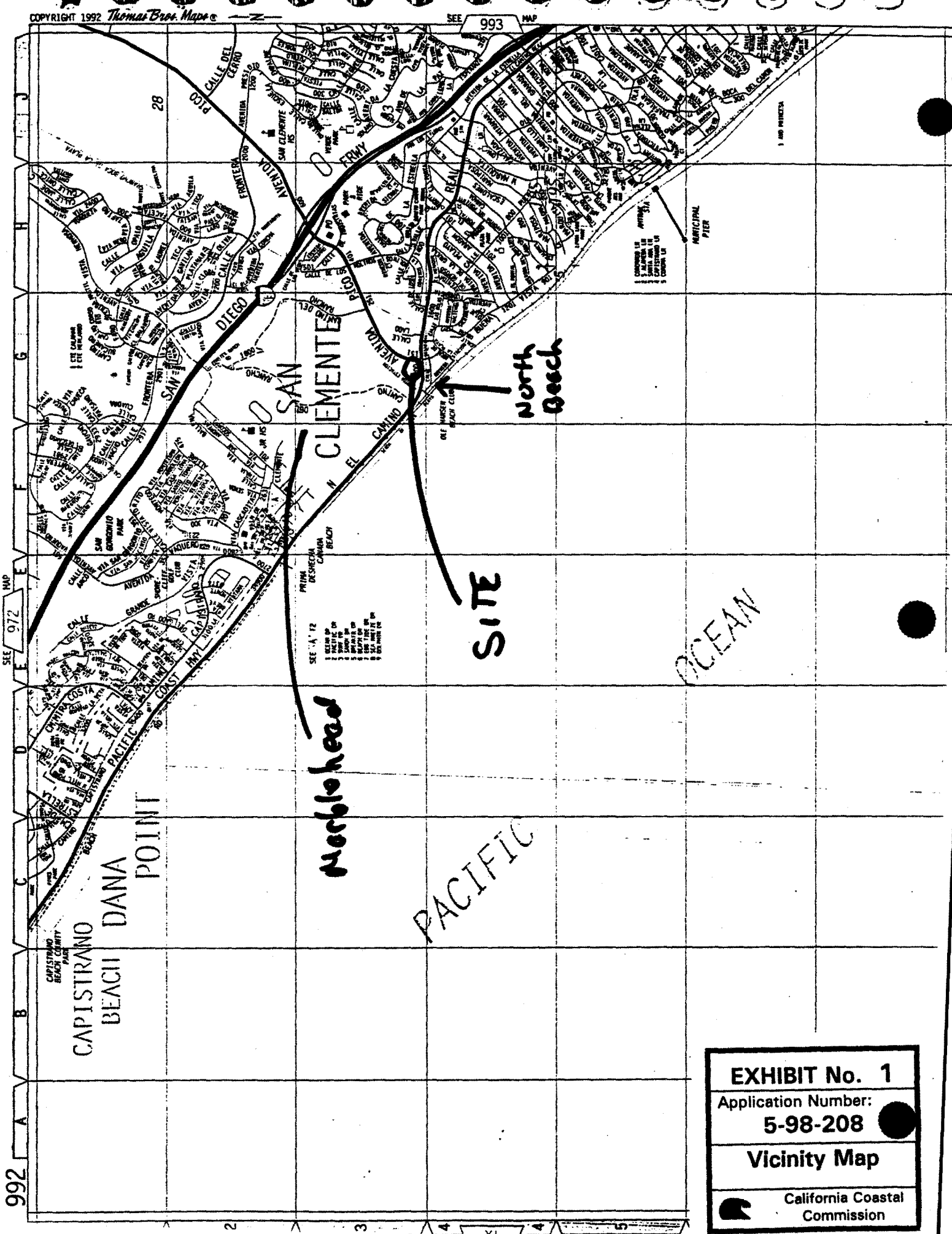


EXHIBIT No. 1

Application Number:
5-98-208

Vicinity Map



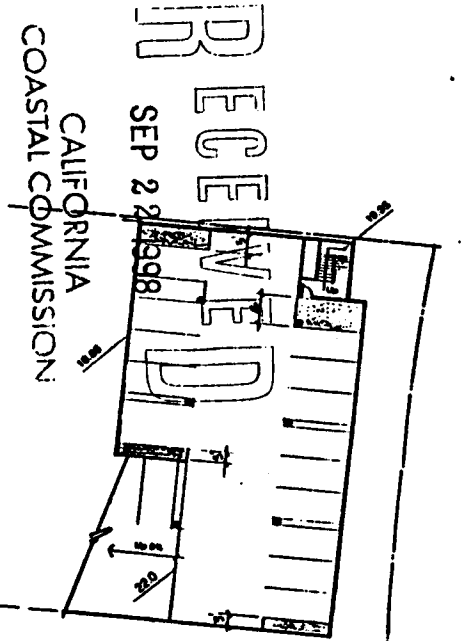
California Coastal
 Commission

UTILITY LINE LEGEND

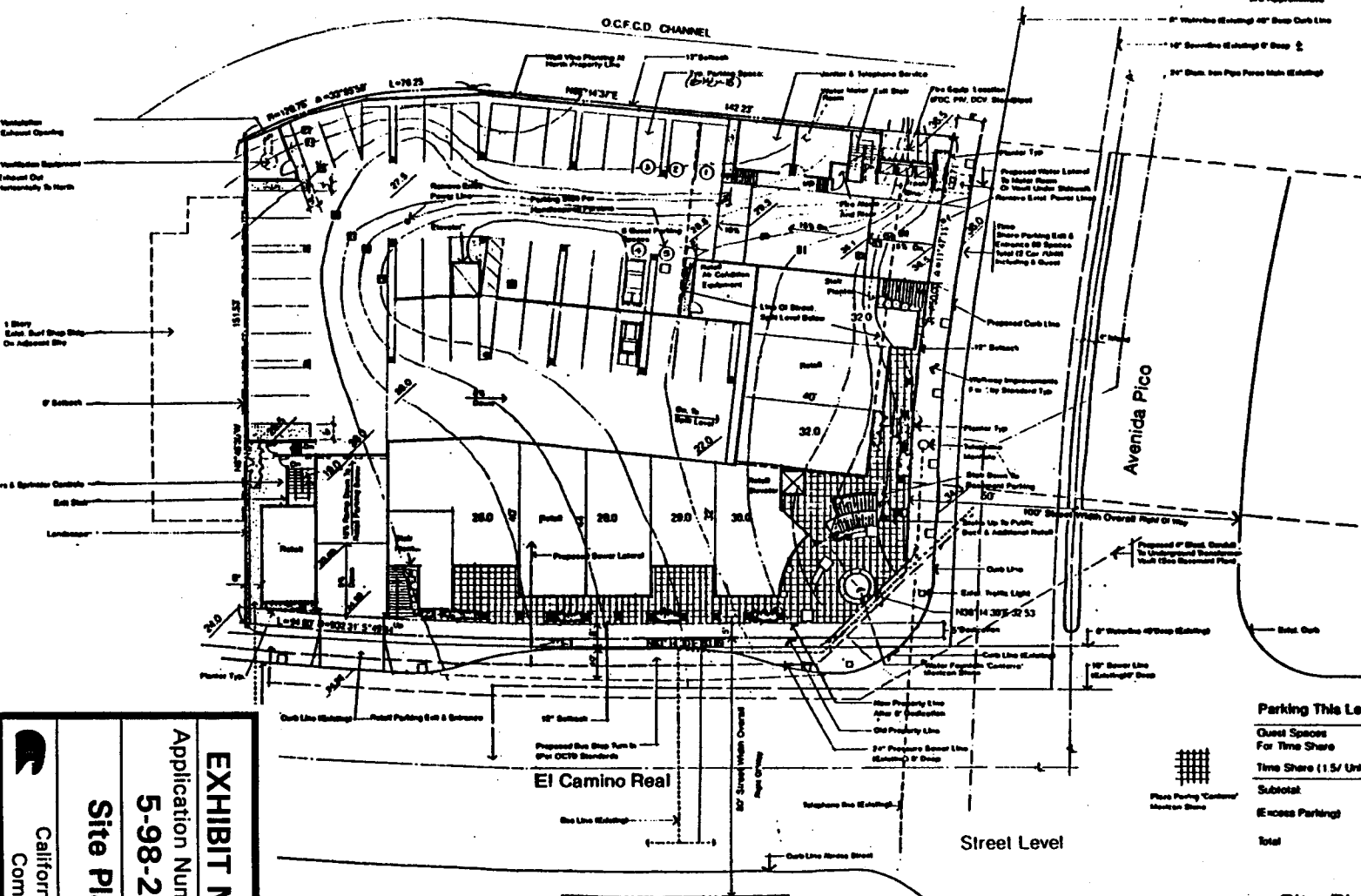
- Gas Line - Existing
 - Proposed 4" Electrical Conduit to Underground Transformer Vault
 - 10" Sewerline 8' Deep - Existing
 - 8" Waterline 40" Deep - Existing
 - Telephone Line - Existing
 - 24" Diam. Iron Pipe Force Main - Existing
 - 24" Pressure Sewer Line (Existing)
- Line Locations Shown on Site Plan are Approximate

REVISED PARKING DATA:

	REVISED/ORIGINAL
STREET LEVEL:	11/42
SPLIT LEVEL:	14/18
BASEMENT LEVEL:	81/68
TOTAL PROVIDED:	116/126
TOTAL REQUIRED:	108/108
EXCESS PARKING PROVIDED:	8/20



Street Split Level @ Time Share Parking



Parking This Level

Guest Spaces For Time Share	5 Req
Time Share (1.5/ Unit)	41 Req
Subtotal	46 Spaces
Excess Parking	9 Spaces (Employee)
Total	55 Spaces Provided

Approx. Total Techniques

Recall Area	4,400 sq. ft.
Place Area	1,000 sq. ft.
Parking Area (Time Share)	15,130 sq. ft.

Note: See Landscape Plan for Remainder of Landscape Info.



Site Plan / Floor Plans

Date: July 04, 1990 Initial
 Revised: Feb. 09, 1993 BSC
 Mar. 12, 1994 CSC
 Apr. 04, 1994 BSC/CSC
 Apr. 18, 1994 BSC/JPC
 May 20, 1994 PC
 June 07, 1994 PC

Scale: 1/16" = 1'-0"
 DEC 21, 1992



California Coastal Commission

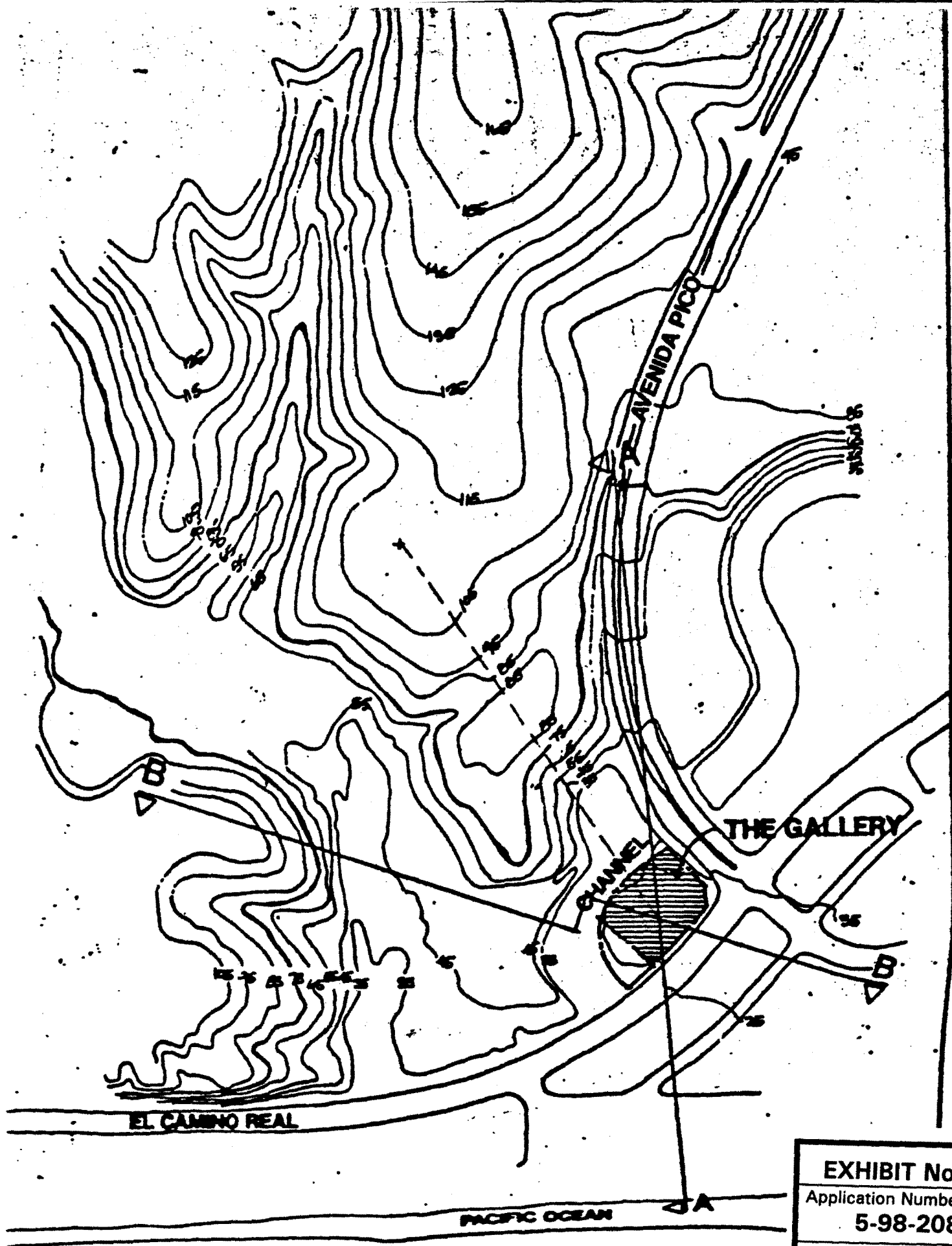
EXHIBIT No. 2

Application Number: 5-98-208


Site Plan

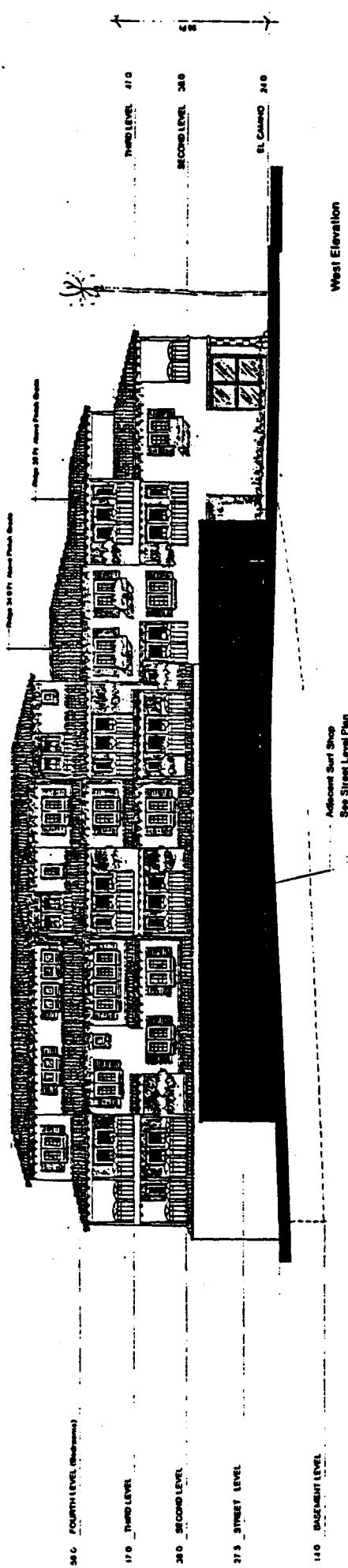
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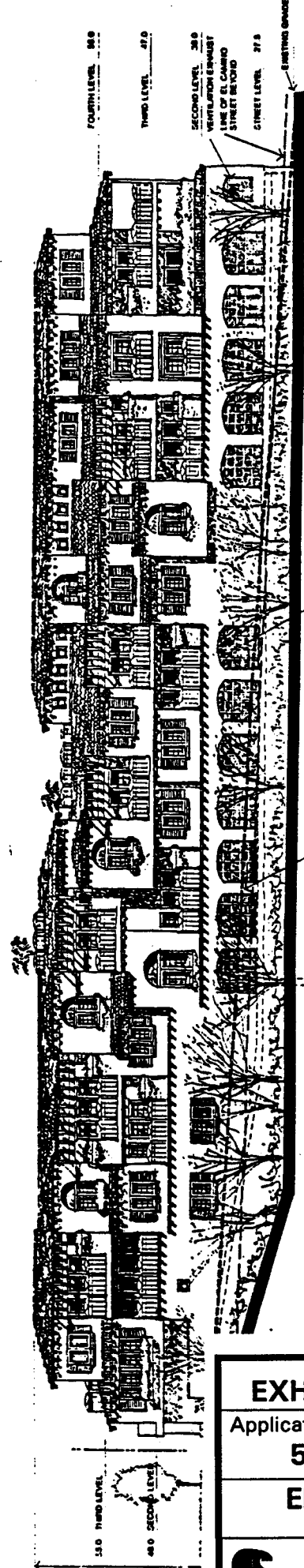


SITE M
Scale 1"=40'

EXHIBIT No. 3
Application Number: 5-98-208
Site Topography
 California Coastal Commission



MAX ALLOWED 40' ELDA
/ 11' @ 75'



DATE: July 01, 1998
BY: [Signature]
CHECKED: [Signature]
APPROVED: [Signature]
SCALE: 1/8" = 1'-0"



Elevations

Clemente, Ca.

Minister, CA 92643

EXHIBIT No. 4

Application Number:
5-98-211

Elevations

California Coastal
Commission

Peter and Associates

Engineers, Geologist, Surveyors,
Civil, Municipal, Mining
Geological, Foundations

1519 Calle Valle • San Clemente, CA 92672
(949) 492-3735 • Fax (949) 492-1891
Toll Free: (888) 590-3735
E-mail: PeterAssoc@AOL.com

August 3, 1998

RECEIVED
AUG 6 1998

CALIFORNIA
COASTAL COMMISSION

Mr. Paul Majos
556 Silverado Way
Anaheim, California 92807

Re: Coastal Development Permit Application 5-98-208: 100-year flooding concerns to the proposed development site located at 1808 North El Camino Real, San Clemente, California
JN 98G8377, JN 96E6030

Dear Mr. Majos:

In accordance with your request, Peter and Associates is pleased to respond to the California Coastal Commission comments/concerns regarding 100-year flooding at the subject site from the adjacent County of Orange - Segunda Deshecha Channel, as discussed in their letter dated July 16, 1998.

There are two concerns of the Coastal Commission, one being the reoccurrence of a 100-year storm over-flooding the adjacent Segunda Deshecha Channel and flooding into your proposed underground parking facilities at the basement level, and the second concern is a possible 100-year storm reoccurrence flooding the property caused by the 1993-1994 under-capacity box culvert located at El Camino Real Highway.

Peter and Associates reviewed the 100-year capacity of the County of Orange Segunda Deshecha Channel and provided hydraulic calculations of the Segunda Deshecha Channel based on county surveying and construction plans for the Segunda Deshecha channel; letter report by Peter & Associates dated March 14, 1996. The current capacity of the Segunda Deshecha Channel is 10,533 cubic feet per second at Station MO2, Avenida Pico and El Camino Real. Based on county redesign of the flood control box culvert from El Camino Real to the Pacific Ocean, the one hundred year design discharge is 6,250 cubic feet per second. Therefore, there is no chance of flooding at the subject site. Please see copy of our letter report dated March 14, 1996 addressing the flooding concerns at the subject property.

The second concern, possible reoccurrence flooding to the property caused by the under-capacity box culvert at El Camino Real Highway is no longer an issue. The box culvert at El Camino Real has been replaced with a new box culvert based on the County of Orange fl criteria. The new box culvert is sufficient to discharge 100-year storm waters.

EXHIBIT No. 6

Application Number:
5-98-208

GEO LETTER



California Coastal
Commission

In conclusion, no impact from 100-year flooding will occur at the subject property.

Peter and Associates is currently updating geotechnical reports for the development of the proposed site. Peter and Associates' updated geotechnical report will address all geotechnical aspects for the subject proposed development, including site plan maps, groundwater, caving, temporary shoring, and flooding, along with other geotechnical issues pertaining to the site proposed development.

Should you have any questions, please call our office.

Very truly yours,



Stephen Peter
RCE 38623
Exp. Date 3/01



THE GALLERY

PROJECT DATA

GENERAL:

DESCRIPTION: MIXED USE, TIME SHARE AND RETAIL WITH PARKING GARAGE
SITE AREA: 33,740 SF, .77 ACRES
LEGAL DESCRIPTION: LOT 1, BLOCK 1, TRACT 795
GENERAL PLAN DESCRIPTION: HIGHWAY COMMERCIAL
EXISTING ZONING: C-2
ZONING REQUEST: NO CHANGE
ACTION REQUESTED: CONDITIONAL USE PERMIT AND TENTATIVE TRACT MAP APPROVAL
EXISTING USE: VACANT

I. TIME SHARE:

A. MODEL TYPE:

MODEL TYPE A	FLAT	950-1000 SF	1 BR	1 BATH	8 UNITS
MODEL TYPE B	FLAT	1100-1200 SF	2 BR	2 BATH	9 UNITS
MODEL TYPE C	FLAT	1250-1300 SF	3 BR	2 BATH	5 UNITS
MODEL TYPE D	2 STORY	1250-1400 SF	3 BR	2.75 B	5 UNITS
TOTALS		32,620 SF	56 BR	49.75 BATH	27 TOTAL

B. PARKING:

27 TOTAL UNITS AT 1.5 CARS/UNIT = 41 REQUIRED

TOTAL

41 REQUIRED
60 PROVIDED AT STREET LEVEL GARAGE
INCLUDING 5 GUEST SPACES AND 14 EXCESS
PARKING FOR EMPLOYEES.

C. OPEN SPACE:

PRIVATE PATIO AREA = 5,025 SF = 186.1 SF/UNIT AVG.
PUBLIC COURTYARD AREA = 7,725 SF = 286.1 SF/UNIT AVG.

DENSITY:

36 DU PER ACRE ALLOWED
35 DU PER ACRE PROPOSAL

EXHIBIT No. 7

Application Number:
5-98-211

Project Specs

California Coastal
Commission

72
-
1
-
2

