

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
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RECORD TICKET COPY

Date Filed: April 25, 2003
49th Day: June 13, 2003
180th Day: October 22, 2003
Staff: SLB-SF
Staff Report: May 22, 2003
Hearing Date: June 12, 2003

STAFF REPORT: CONSENT CALENDAR**APPLICATION FILE NO.:** 2-03-011**APPLICANT:** Mustafa Halawa

PROJECT DESCRIPTION: Construction of a 1,900-square-foot, 15-foot-high single-family residence, a gravel driveway and granite parking area, granite patio, sand filter septic system, and hot tub, the removal of a pine tree, and landscaping on a 7,500-square-foot vacant lot.

PROJECT LOCATION: 169 Seadrift Road, Stinson Beach, Marin County
APN 195-031-37

LOCAL APPROVALS: Marin County Design/Architectural Review

SUBSTANTIVE FILE DOCUMENTS: Geotechnical Investigation, Blake Residence, 169 Seadrift Road, Stinson Beach, California.
SalemHowes Associates Inc. September 17, 1999.

1.0 EXECUTIVE SUMMARY

The applicant proposes to construct a 1,900-square-foot, 15-foot-high, single-family residence with a 497-square-foot gravel driveway and granite parking area, an approximately 310-square-foot granite patio, a sand filter septic system, and hot tub, remove a pine tree six inches in diameter, and landscape on a 7,500-square-foot vacant lot. Commission staff recommends approval of the permit with conditions to mitigate impacts related to geologic hazards and polluted runoff.

STAFF NOTE

The proposed project is located in the Seadrift Lagoon Subdivision of Stinson Beach in Marin County (Exhibit 1, Regional Map & Exhibit 2, Vicinity Map). Although Marin County has a certified LCP, the project site is located on filled public trust lands over which the State retains a public trust interest. Therefore, pursuant to Section 30519 of the Coastal Act, the Commission maintains development review authority. The standard of review that the Commission must apply to the project is the Chapter 3 policies of the Coastal Act.

2.0 STAFF RECOMMENDATION

The staff recommends conditional approval of Coastal Development Permit Application No. 2-03-011.

Motion: *I move that the Commission approve Coastal Development Permit Application No. 2-03-011, subject to the conditions specified below.*

Staff Recommendation of Approval

The staff recommends a YES vote. To pass the motion, a majority of the Commissioners present is required. Approval of the motion will result in the adoption of the following resolution and findings.

Resolution

The Coastal Commission hereby **grants** permit No. 2-03-011, subject to the conditions below, for the proposed development on the grounds that (1) the development is in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976 and (2) there are no feasible alternatives or feasible mitigation measures other than those specified in this permit that would substantially lessen any significant adverse impact that the activity may have on the environment.

2.1 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 on which the Commission voted on the application. 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. Interpretation. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. 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.
5. 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.

2.2 Special Conditions

1. Conformance of Design and Construction Plans to Geotechnical Report Geologic Hazard
 - A. All final design and construction plans, including foundations, grading and drainage plans, shall be consistent with all recommendations contained in Sections titled Seismic Design Considerations, Foundation Design and Foundation Conditions of the Engineering Geologic Reports prepared by SalemHowes Associates INC. and dated September 17, 1999 and amended March 5, 2003. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the Executive Director's

2-03-011 (Halawa)

review and approval, evidence that an appropriate licensed professional has reviewed and approved all final design and construction plans and certified that each of those final plans is consistent with all of the recommendations specified in the above-referenced geologic evaluation approved by the California Coastal Commission for the project site.

- B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. Assumption of Risk, Waiver of Liability and Indemnity.

- A. By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards from seismic activity; (ii) to assume the risks to the applicant and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

3. Construction Period Erosion Control.

- A. *Prior to the issuance of the coastal development permit*, the applicant shall submit, for the review and approval of the Executive Director, an erosion control plan to prevent the transport of sediment from the project site. The plan shall be designed to minimize the potential sources of sediment, control the amount of runoff, and retain sediment on-site during construction. The plan shall also limit application, generation, and migration of toxic substances, ensure the proper storage and disposal of toxic materials, and ensure the application of nutrients at rates necessary to establish and maintain vegetation without causing significant nutrient runoff to Seadrift Lagoon. The Erosion Control Plan shall include, at a minimum, the Best Management Practices specified below:

1. Erosion & Sediment Source Control

- a. Sequence construction to install **sediment-capturing devices** first, followed by runoff control measures and runoff conveyances. Land clearing activities should only commence after the minimization and capture elements are in place.
- b. Time the grading activities to avoid the rainy season (October 15 through April 30).
- c. Within five days of clearing or inactivity in construction, stabilize bare soils through either non-vegetative BMPs such as mulching or vegetative erosion

control methods such as seeding. Vegetative erosion control shall be established within two weeks of seeding/planting.

- d. Construction entrances should be stabilized immediately after grading and frequently maintained to prevent erosion and control dust.
- e. Cover excavated material with plastic during storm events to reduce the potential of erosion.
- f. Place stockpiled soil and/or other construction-related material away from any drainages. These stockpiles shall be contained to prevent runoff. Stockpiled soils shall be covered with tarps at all times of the year.
- g. If sprinkling is used for dust control, application monitoring is required to prevent runoff.

2. Runoff Control and Conveyance

- a. Intercept runoff above disturbed slopes and convey it to a permanent channel or stormdrains by using earth dikes, perimeter dikes or swales, or diversions.

3. Sediment-Capturing Devices

- a. Install sediment traps/basins at outlets of diversions, channels, slope drains, or other runoff conveyances that discharge sediment-laden water. Sediment traps/basins shall be cleaned out when 50% full (by volume).
- b. Use silt fencing to trap sediment contained in sheet flow. The maximum drainage area to the fence should be 0.5 acre or less per 100 feet of fence. Silt fences should be inspected regularly and sediment removed when it reaches 1/3 the fence height.

4. Chemical Control

- a. Store, handle, apply, and dispose of pesticides, petroleum products, and other construction materials properly.
- b. Maintain and wash equipment and machinery in confined areas specifically designed to control runoff. Restriction of washing and cleaning of equipment and construction vehicles within 100 feet of the Seadrift Lagoon.
- c. Provide adequate disposal facilities for solid waste produced during construction.

B. The permittee shall be fully responsible for advising construction personnel of the requirements of the approved Erosion Control Plan.

C. The permittee shall undertake development in accordance with the approved Erosion Control Plan. No proposed changes to the approved Erosion Control Plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

4. Post-Construction Stormwater Pollution Prevention Plan.

A. *Prior to issuance of the coastal development permit*, the applicant shall submit, for the review and approval of the Executive Director, a Post-Construction Pollution Prevention

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Plan showing final drainage and runoff control measures. The plan shall be prepared by a licensed engineer or architect and shall incorporate structural and non-structural Best Management Practices (BMPs) designed to control the volume, velocity and pollutant load of storm water leaving the developed site after completion of construction. The runoff control plan shall demonstrate that runoff from the project shall be prevented from entering Seadrift Lagoon. The Post-Construction Polluted Runoff Prevention Plan shall, include at minimum, the BMPs specified below:

1. Eliminate any downspouts located within 30 feet of Seadrift Lagoon.
2. Splashguards shall be installed at the base of all downspouts.
3. Native or non-invasive drought-tolerant adapted vegetation shall be selected, in order to minimize the need for fertilizer, pesticides/herbicides, and excessive irrigation.
4. The final site plan shall show the finished grades and the locations of the drainage improvements, including downspouts and splashguards

B. The permittee shall undertake development in accordance with the approved plan. Any proposed changes to the approved plan shall be reported to the Executive Director. No changes to the approved plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

5. Deed Restriction

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the applicant has executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

6. Landscaping

No invasive exotic plant species shall be planted on the property that is the subject of this permit for the life of the development authorized herein.

3.0 FINDINGS AND DECLARATIONS

The Commission hereby finds and declares as follows:

3.1 Project Location

The project site is located at 169 Seadrift Road on the filled portion of the sand spit between Seadrift Road and Seadrift Lagoon in Stinson Beach, Marin County (Exhibit 1, Regional Map & Exhibit 2, Vicinity Map). Seadrift Lagoon is an artificially created interior lagoon located between Dipsea and Seadrift Roads. The Seadrift area is a privately maintained, gated community. The parcel is approximately 125 feet long and 60 feet wide, totaling 7,500 square feet (Exhibit 3, Assessor Parcel Map). As with all of the properties located adjacent to Seadrift Lagoon, an existing wooden bulkhead borders the lagoon side of the project site. The bulkhead is approximately three feet high and consists of wooden posts and lagging. The project site is currently vegetated with ice plant, and a pine tree six inches in diameter. The site is underlain by medium dense poorly sorted silty sand with abundant shell fragments and scattered lenses of coarse sand. The property is bordered on the south by Seadrift Road, the north by Seadrift Lagoon and the east and west by single-family residences.

3.2 Project Description

The applicant proposes to construct a 1,900-square-foot, 15-foot-high, single-family residence, a 497-square-foot gravel driveway and granite parking area, an approximately 310-square-foot granite patio, a sand filter septic system, a hot tub, remove a pine tree six inches in diameter, and landscape on a 7,500 square-foot vacant lot (Exhibit 5, Site Plans & Elevations). The proposed house, parking area, hot tub, stairs, walkways, and patio would cover 3,123 square feet of the lot. The proposed septic system consists of a 1,500-gallon concrete septic tank, 810-gallon pump chamber, a sand filter, and leach fields.

3.3 Coastal Act Issues

3.3.1 Hazards

Section 30253 states in relevant part:

New development shall:

Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

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.

SalemHowes Associates Inc. completed a geotechnical investigation, dated September 17, 1999, which was submitted as part of the project file documents (SHA 1999). The report notes that the project site is located within the San Andrea Fault Zone approximately 4,000 feet east of the 1906 fracture trace. In this area the underlying materials are medium dense poorly sorted silty sands with abundant shell fragments and scattered lenses of coarse sand. The water level is generally six feet below the surface (SHA 1999). The report finds that under static conditions the subgrade material will provide moderate bearing capacities capable for supporting a residential structure. However, it also states that during an earthquake of 6.5 magnitude or greater, with an epicenter on the San Andreas in this vicinity, the site is subject to liquefaction to a depth of at least 30 feet, which may result in horizontal spreading with severe tilting and a loss of elevation. To mitigate the geotechnical risk to the project, the report specifies design measures for soil preparation, foundation design, and construction inspection.

Given the information presented above, the Commission finds that the subject lot is an inherently hazardous piece of property. In order to minimize the development's risk to life and property in an area of high geologic hazard consistent with Section 30253 of the Coastal Act, SalemHowes Associates INC., reviewed the proposed structural plans and verified that the plans conform to the recommendations contained in their geotechnical investigation dated September 17, 1999 and amended March 5, 2003. **Special Condition 1** requires the development to be undertaken in full conformity with the recommendation contained in the SalemHowes geotechnical investigation.

However, because the applicant proposes development on a geologically hazardous site, the Commission imposes **Special Condition 2**, which requires the landowner to assume the risks of any losses associated with the proposed development due to seismic hazards of the property, waive any claim of liability on the part of the Commission for such losses, and indemnify the Commission in the event that third parties bring an action against the Commission as a result of the failure of the development to withstand hazards. The Commission finds that **Special Condition 2** is required because the applicant has voluntarily chosen to implement the project despite the risk of hazards.

In addition, **Special Condition 5** requires that a deed restriction be recorded informing future buyers of the property of the special conditions of the permit, including the required conformance of all plans to the geotechnical recommendations and the requirement that the landowner assume the risk and indemnify the Commission from all liability associated with the approved development. Recordation of such a deed restriction will provide notice to future buyers/owners of potential hazards of the property and eliminate false expectations of potential buyers of the property, lending institutions, and insurance agencies that the property is safe for an indefinite period of time and for further development indefinitely into the future. In addition, the condition ensures that future owners will be informed of the Commission's immunity from liability and the indemnity afforded the Commission. Therefore, as conditioned, the proposed development minimizes risks to life and property in areas of high geologic, flood, and fire hazard and is consistent with Section 30253 of the Coastal Act.

3.3.2 Erosion and Polluted Runoff

Coastal Act Section 30231 states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The project site, which is adjacent to Seadrift Lagoon, is level as it extends from Seadrift Road. Approximately 12 feet from the lagoon, the site slopes four feet down to the level of the wooden bulkhead.

Approximately 48 cubic yards of material would be excavated for the foundation and septic system. The applicant's geotechnical investigation characterizes the substrate as medium dense poorly sorted silty sand with abundant shell fragments and scattered lenses of coarse

sand (SHA 1999). This sandy substrate allows a rapid rate of percolation into the water table relative to other soil types; however, when cleared of vegetation it is also subject to wind erosion.

As proposed, the project would create over 3,123 square feet of new impervious surfaces, including the rooftops of the residence, the parking area, hot tub, stairs, walkways, and patio. Sediments or polluted runoff caused by the development during construction and increased runoff from new impervious surfaces could adversely impact the biological productivity and quality of Seadrift Lagoon in conflict with Section 30231 of the Coastal Act.

To ensure that the proposed development does not adversely affect the biological productivity and quality of coastal waters, the Commission imposes **Special Conditions 3 and 4** to require the applicant to employ best management practices to prevent the runoff of sediments and other pollutants into Seadrift Lagoon. **Special Condition 3** requires the applicant to submit an erosion control plan, which incorporates the Best Management Practices listed in **Special Condition 3**, to minimize the potential sources of sediment, control the amount of runoff, and retain sediment on-site during construction. The plan must also limit the application, generation, and migration of toxic substances and ensure the proper storage and disposal of toxic materials without causing significant nutrient runoff to Seadrift Lagoon. **Special Condition 4** requires the applicant to submit a post-construction stormwater pollution prevention plan to control the volume, velocity, and pollutant load of stormwater on the developed site after project construction. In addition, **Special Condition 5** requires that a deed restriction be recorded informing future buyers of the property of the special conditions of the permit, including the required erosion control and storm water pollution prevention mitigation measures. As conditioned, the development would not result in significant adverse impacts to coastal water quality during or after construction. The Commission therefore finds that the proposed development would protect the biological productivity and the quality of coastal waters and conforms with Section 30231 of the Coastal Act.

3.4 California Environmental Quality Act (CEQA)

Section 13096 of the California Code of Regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, 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 effects, which the activity may have on the environment.

The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. The proposed project has been conditioned to be found consistent with the policies of the Coastal Act and to minimize all significant adverse environmental effects. Mitigation measures have been imposed to prevent introduction of runoff and sediment into Seadrift Lagoon and protect against geologic hazards. As conditioned, there are no feasible alternatives or feasible mitigation measures available, beyond those required, which would substantially lessen any significant adverse impacts, which the development may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with Coastal Act requirements to conform to CEQA.

2-03-011 (Halawa)

EXHIBITS:

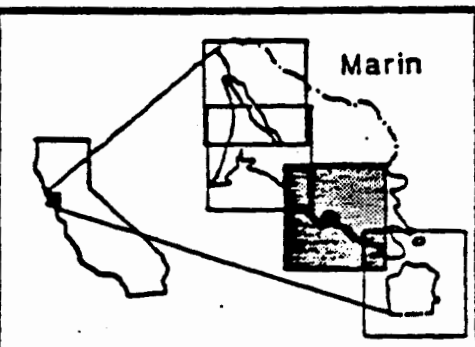
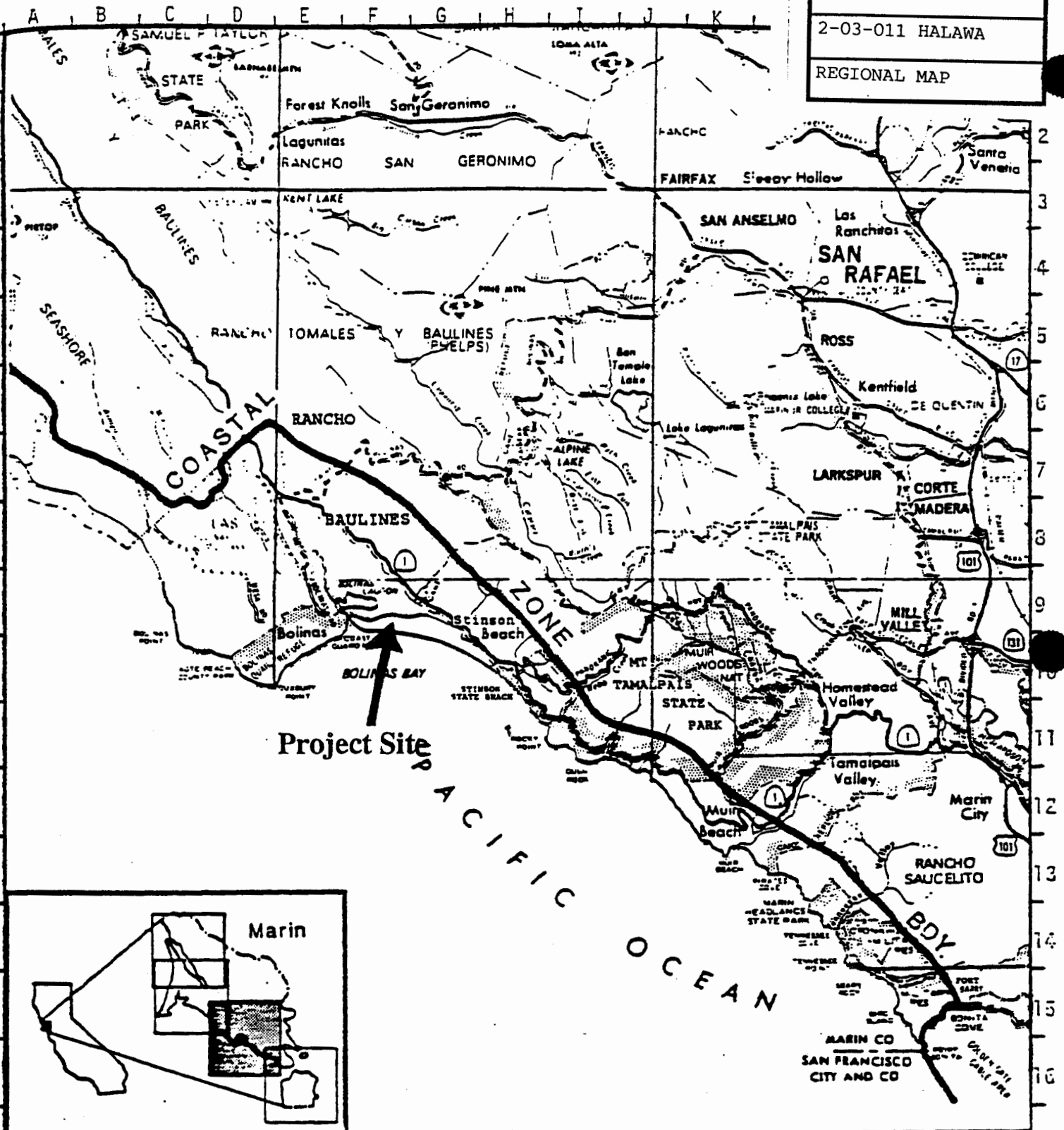
1. Regional map
2. Vicinity map
3. Assessors Parcel Map
4. Site Photographs
5. Site plans and elevations

EXHIBIT NO. 1

APPLICATION NO.

2-03-011 HALAWA

REGIONAL MAP



California Coastal Commission

LOCATION MAP

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miles



County of Marin

Sheet 3 of 3

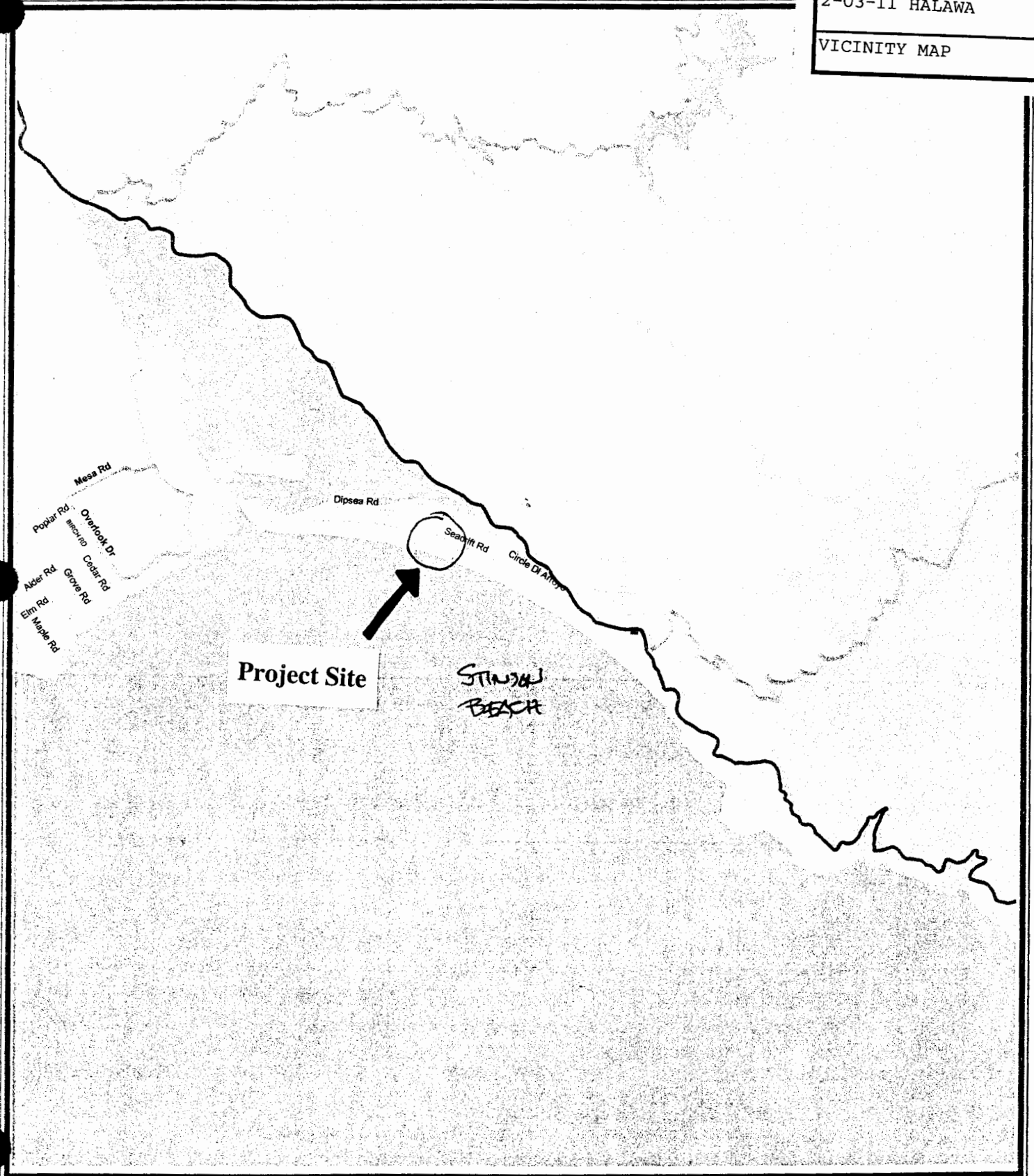
Current Map

EXHIBIT NO. 2

APPLICATION NO.

2-03-11 HALAWA

VICINITY MAP



Tax Rate Area
56-011

195-03

Project Site

1" = 100'

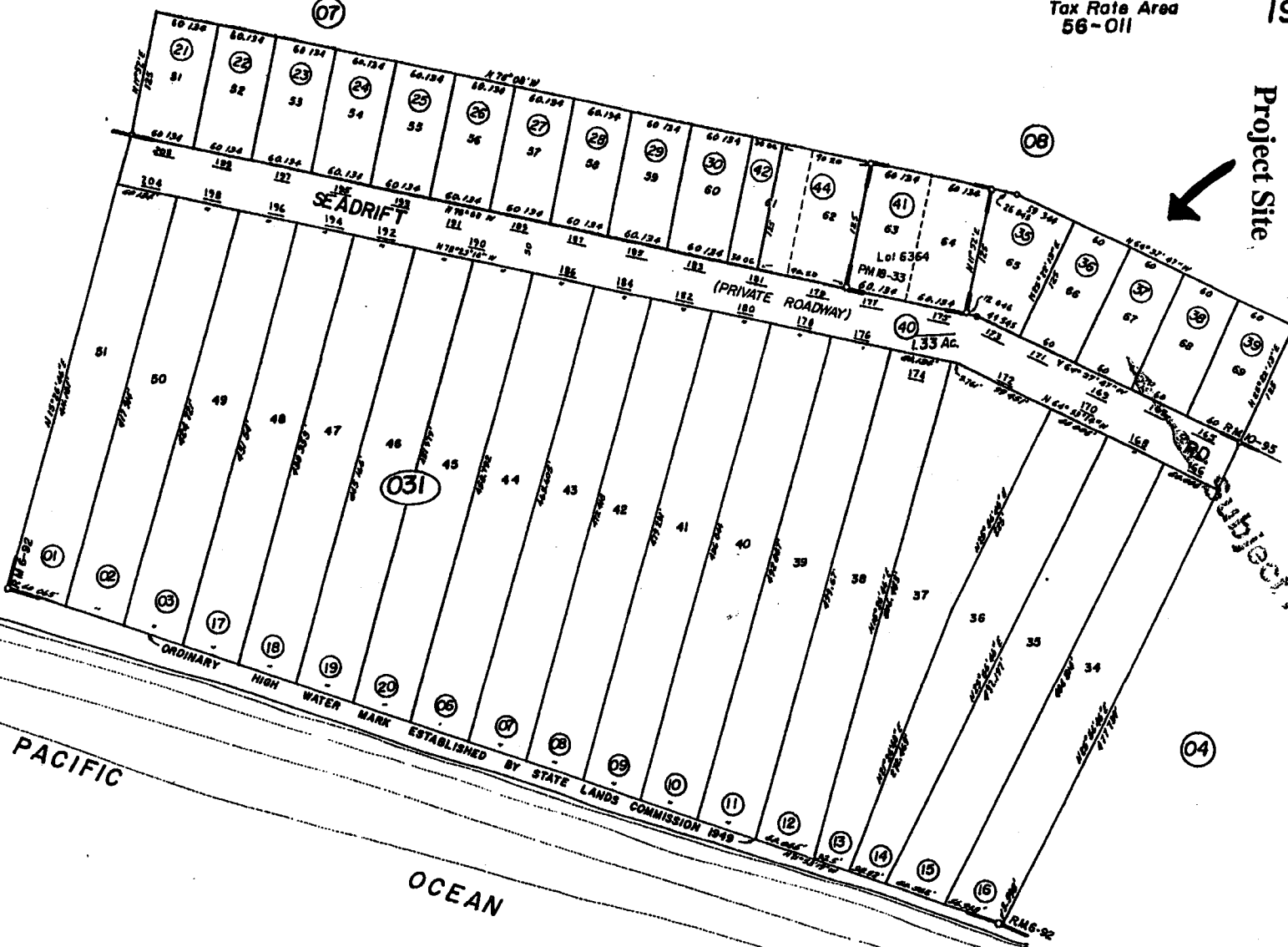
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08

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031



PACIFIC

OCEAN

Map of Seadrift Subdivision No. 1, R.M. Bk. 6-Pg. 92
Map of Seadrift Lagoon Subdivision No. 1, R.M. Bk. 10-Pg. 95

NOTE—Assessor's Block Numbers Shown in Ellipses.
Assessor's Parcel Numbers Shown in Circles.

Assessor's Ma
County of

EXHIBIT NO. 3
APPLICATION NO.
2-03-11 HALAWA
ASSESSORS PARCEL
MAP

"This plat is for your aid in locating your land with reference to streets and other parcels. While this plat is believed to be correct, the Company assumes no liability for any loss occurring by reason of reliance thereon."

8-23-DL
6-15-95 LJ

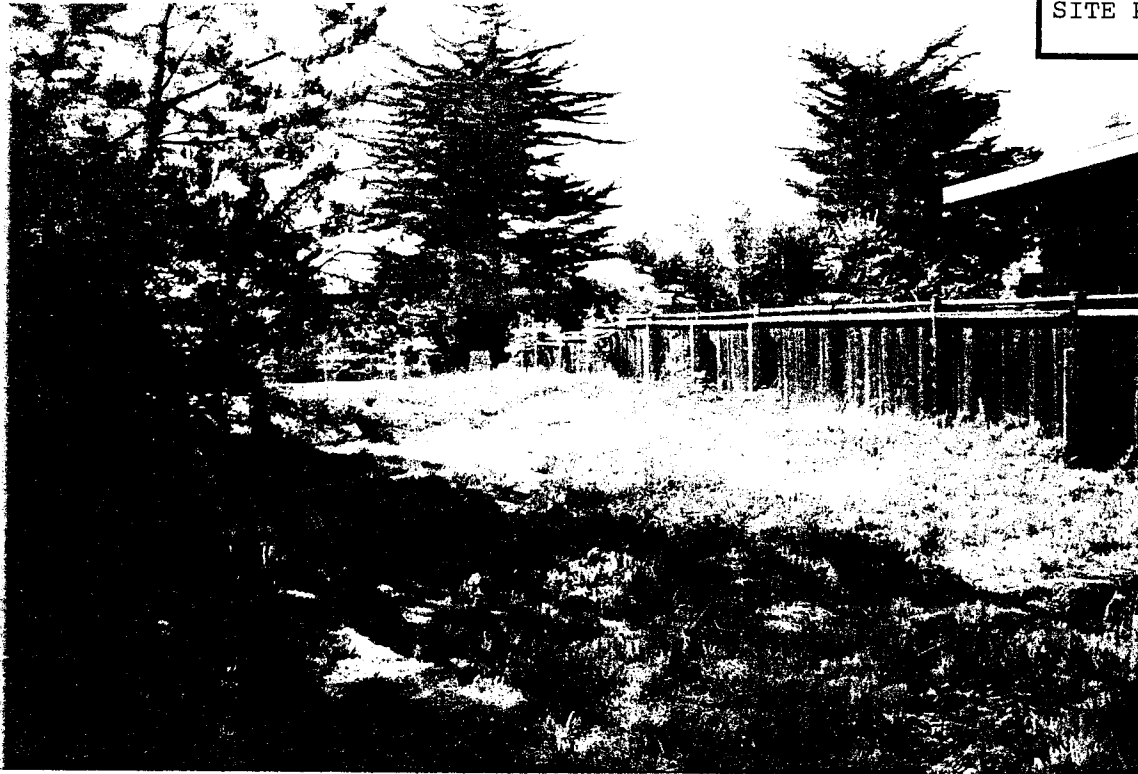
EXHIBIT NO. 4

APPLICATION NO.

2-03-011 HALAWA

SITE PHOTOGRAPHS

169 Seadrift Rd.



Photograph #3



Photograph #4

EXHIBIT NO. 5

APPLICATION NO.

2-01-011 HALAWA

SITE PLANS

AND ELEVATIONS

DOOR THRESHOLDS

SITE PLAN

CONDITIONS OF APPROVAL

1. THE MAXIMUM FINISHED FLOOR ELEVATION SHALL NOT EXCEED 11.14 FEET MVD AND THE MAXIMUM HEIGHT OF THE RESIDENCE FROM FINISHED FLOOR TO TOP OF ROOF RIDGE SHALL NOT EXCEED A HEIGHT OF 15 FEET PURSUANT TO MARIN COUNTY CODE SECTION 22.56.1300(X).
2. EXTERIOR LIGHTING SHALL BE FOR SAFETY PURPOSES ONLY, MUST CONSIST OF LOW-WATTAGE FIXTURES, AND MUST BE DIRECTED DOWNWARD AND SHIELDED.
3. ALL FLASHING, METAL WORK AND TRIM SHALL BE AN APPROPRIATELY SHIELDED, NONREFLECTIVE COLOR.
4. ALL UTILITY CONNECTIONS AND EXTENSIONS SERVING THE PROJECT SHALL BE INSTALLED UNDERGROUND.
5. IT SHALL BE THE RESPONSIBILITY OF THE APPLICANT TO STORE ALL CONSTRUCTION MATERIALS AND EQUIPMENT AT THE SITE (OR SECURED AT AN APPROVED OFF-SITE LOCATION) IN SUCH A MANNER AS TO PERMIT SAFE PASSAGE FOR VEHICULAR TRAFFIC AT ALL TIMES. EVERY EFFORT SHALL BE MADE BY THE HOLDER OF THE BUILDING PERMIT TO STRICTLY LIMIT THE NUMBER OF VEHICLES USED TO TRANSPORT WORKERS TO THE SITE TO THE MINIMUM NUMBER NECESSARY. WORK AT THE SITE SHALL BE LIMITED TO THE HOURS OF 7:30 AM AND 5:00 PM, MONDAY THROUGH FRIDAY, AND 8:00 AM TO 4:00 PM SATURDAY. NO WORK SHALL BE PERMITTED ON SUNDAYS OR HOLIDAYS. DURING CONSTRUCTION, THE APPLICANT SHALL TAKE ALL APPROPRIATE MEASURES, INCLUDING WATERING OF DISTURBED AREAS AND COVERING THE BEDS OF TRUCKS HAULING FILL TO OR FROM THE SITE, TO PREVENT DUST FROM GRADING AND FILL ACTIVITY ON SURROUNDING PROPERTIES.

PROJECT TEAM

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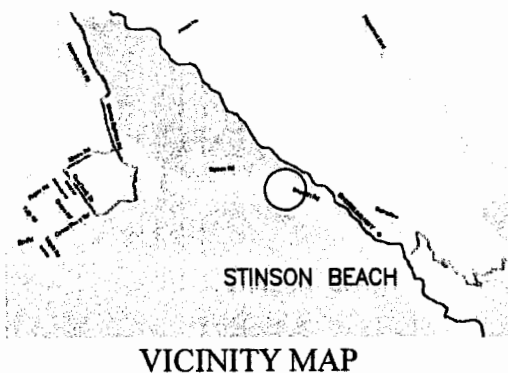
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SAN RAFAEL, CA 94901
PHONE: 415 457 0990
FAX: 415 457 1986

NOT FOR CONSTRUCTION
90% CONSTRUCTION DOCUMENTS



VICINITY MAP

SHEET INDEX

- A1 SITE PLAN
- C1 SEWAGE DISPOSAL SYSTEM
- A2 FLOOR PLAN/ ROOF PLAN
- A3 EXTERIOR ELEVATIONS
- A4 EXTERIOR ELEVATIONS
- A5 SECTIONS
- A6 SECTIONS
- A7 INTERIOR ELEVATIONS
- A8 DETAILS
- A9 DETAILS
- A10 TITLE 24
- S1 FOUNDATION PLAN
- S2 CEILING FRAMING PLAN
- S3 ROOF FRAMING PLAN
- S4 STRUCTURAL DETAILS

REVISIONS	
1	1-21-03
2	2-10-03
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SITE PLAN
VICINITY MAP
PARCEL MAP

FINANCING PACKAGE

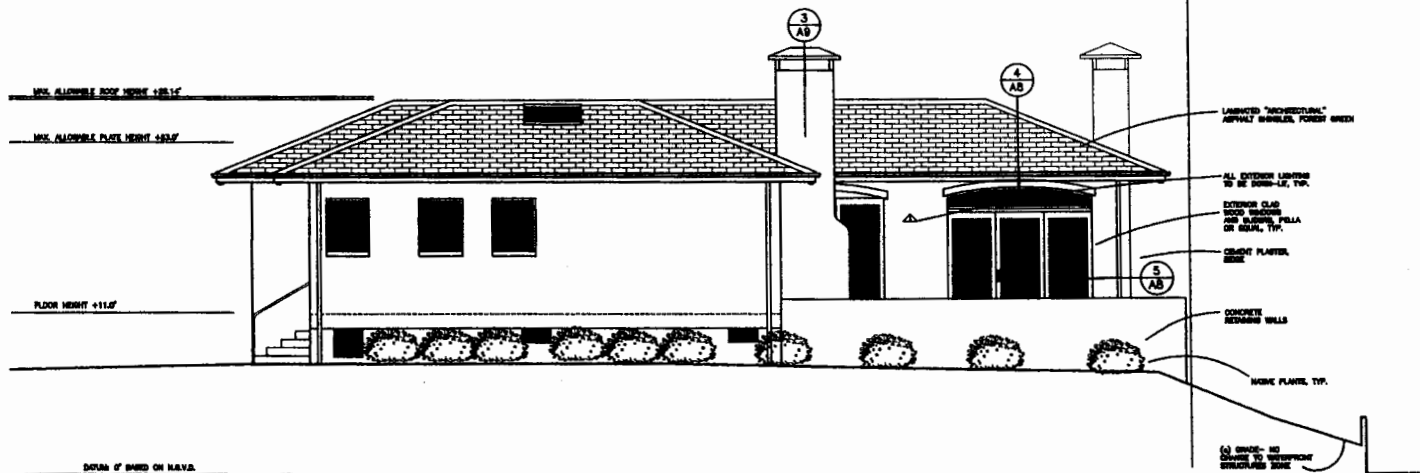
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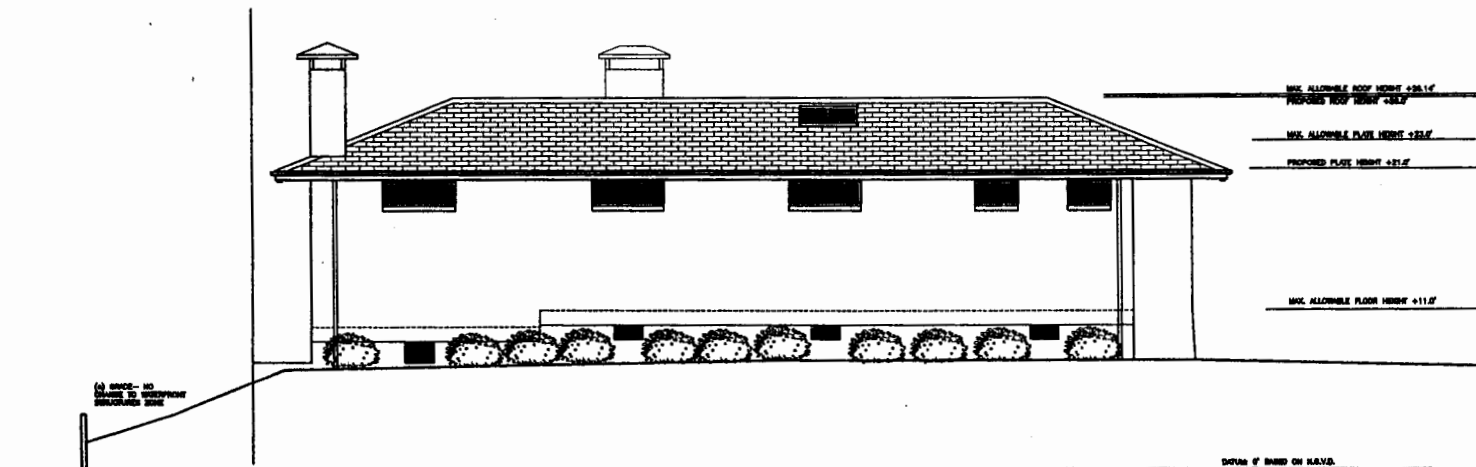
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PATRICK LE PELCH

SINGLE FAMILY HOME
FOR:
MUSTAFA HALAWA
AT: 169 SEADRIFT ROAD
STINSON BEACH, CA 94970 A.P.N. 195-031-37



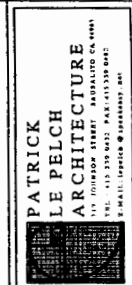
1
A4
EXTERIOR ELEVATION- SIDE YARD- (SOUTHEAST)

1/4"=1'-0"



2
A4
EXTERIOR ELEVATION- SIDE YARD- (NORTHWEST)

1/4"=1'-0"



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PATRICK LE PELCH

SINGLE FAMILY HOME
FOR
MUSTAFA HALAWA

169 SEADRIFT ROAD, 94970 APN. 195-031-37
STINSON BEACH, CA.

REVISIONS	
1	1-21-03
2	3-10-03
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5	

EXTERIOR ELEVATIONS

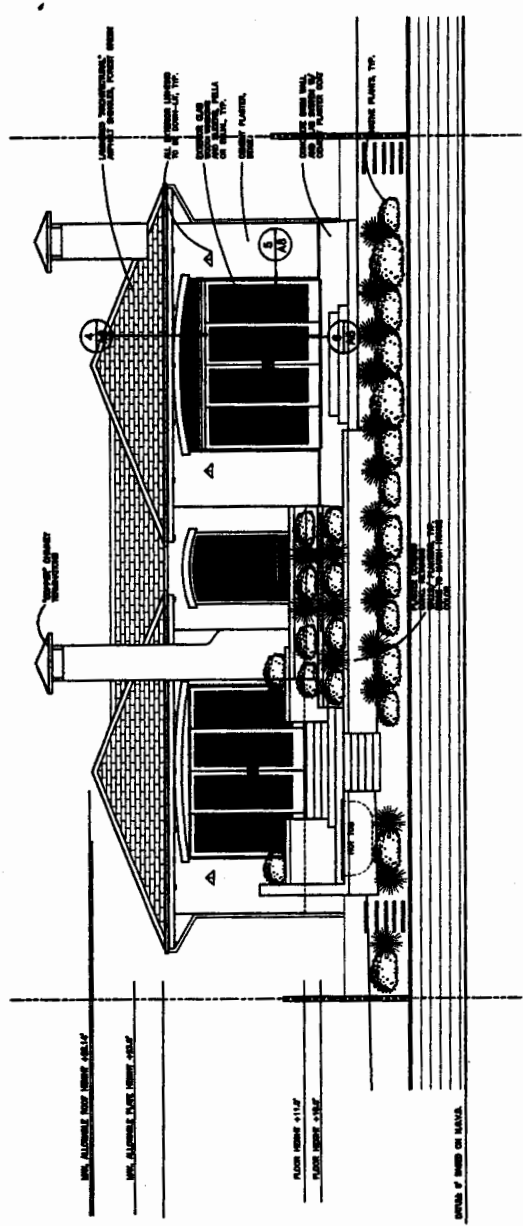
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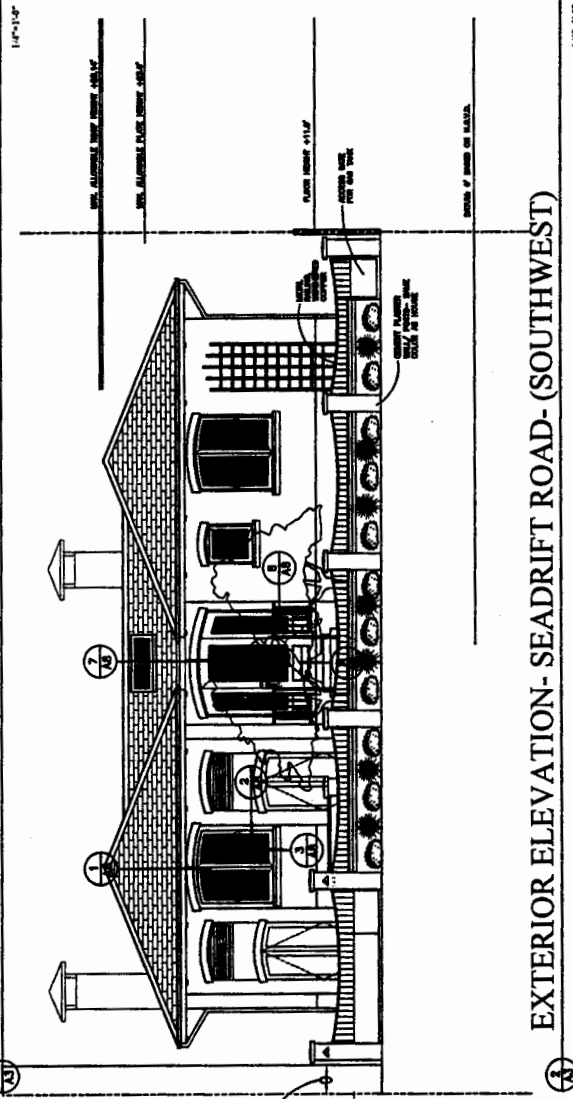
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D.B.:

A4 OF 15



EXTERIOR ELEVATION-LAGOON-(NORTHEAST)



EXTERIOR ELEVATION-SEADRIFT ROAD-(SOUTHWEST)