

CALIFORNIA COASTAL COMMISSION

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



Filed: April 30, 2003
 49th Day: June 18, 2003
 180th Day: October 27, 2003
 Staff: ALB-LB **ALB**
 Staff Report: June 19, 2003
 Hearing Date: July 9-11, 2003
 Commission Action:

W4c**STAFF REPORT: CONSENT CALENDAR**

APPLICATION NUMBER: 5-03-112 **RECORD PACKET COPY**

APPLICANT: Diademare, LLC

AGENT: Todd Schooler

PROJECT LOCATION: 315 Cazador Lane, San Clemente, Orange County

PROJECT DESCRIPTION: Construction of a new three-story, 4535 square foot, two-unit condominium complex with two 352 square foot, two-car garages on a coastal canyon lot.

LOCAL APPROVALS RECEIVED: Approval of Tentative Parcel Map 2002-105 by the San Clemente City Council on June 3, 2003; Approval of Variance 02-057, Cultural Heritage Permit 02-096 and Minor Exception Permit 03-006 by the San Clemente Planning Commission on February 5, 2003 and San Clemente Planning Division Approval in Concept dated March 13, 2003.

SUBSTANTIVE FILE DOCUMENTS: City of San Clemente Certified Land Use Plan (LUP); *Preliminary Geotechnical Investigation for Foundation Design, Proposed Duplex, 315 Cazador Lane, San Clemente, CA (Report No. 03-043)* prepared by ViaGeos Consulting Engineering Geologists dated April 14, 2003.

SUMMARY OF STAFF RECOMMENDATION:

Staff is recommending **APPROVAL** of the proposed project with six (6) special conditions, which require 1) evidence of conformance with geotechnical recommendations; 2) submittal of a final landscaping plan; 3) evidence of approval from OCFA; 4) conformance with the grading and drainage plan submitted; 5) compliance with construction-related best management practices (BMPs); and 6) future improvements come back to the Commission for review. The primary issues associated with this development are geologic hazards, water quality and canyon habitat enhancement. At the time of this staff report, the applicant is in agreement with the staff recommendation and special conditions.

LIST OF EXHIBITS:

1. Location Map
2. Site Plan
3. Project Plans

MOTION: ***I move that the Commission approve the coastal development permit applications included on the consent calendar in accordance with the staff recommendations.***

STAFF RECOMMENDATION TO ADOPT CONSENT CALENDAR:

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION:

I. APPROVAL WITH CONDITIONS

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and 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. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

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. Interpretation. Any questions of intent or 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.

III. **SPECIAL CONDITIONS:**

1. Conformance of Design and Construction Plans to Geotechnical Recommendations

- A. All final design and construction plans, including foundations, grading and drainage plans, shall be consistent with all recommendations contained in the *Preliminary Geotechnical Investigation for Foundation Design, Proposed Duplex, 315 Cazador Lane, San Clemente, CA (Report No. 03-043)* prepared by ViaGeos Consulting Engineering Geologists dated April 14, 2003.
- B. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit final design and construction plans, for the Executive Director's review and approval, along with evidence that an appropriately licensed professional has reviewed and approved such 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.
- C. 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 required.

2. Submittal of Final Landscaping Plan

- A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit a final landscape plan in substantial conformance with the landscaping plan prepared by Land Architecture dated February 27, 2003. In addition, the applicant shall implement the following:
- (a) All vegetation, including existing native plantings on the canyon slope, shall be maintained in good growing condition throughout the life of the project, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with the landscaping plan;
- (b) Landscaped areas in the rear yard (canyon-facing) areas shall be planted and maintained for erosion control and native habitat enhancement purposes. To minimize the need for irrigation and minimize encroachment of non-native plant species into adjacent existing native plant areas, all landscaping adjacent to Trafalgar Canyon shall consist of drought tolerant plants native to coastal Orange County and appropriate to the habitat type. Invasive, non-indigenous plant species that tend to supplant native species shall not be used;
- (c) Landscaped areas in the front yard (street-facing) area can include ornamental or native, drought tolerant plants. Vegetation installed in the ground shall consist of non-invasive, drought tolerant plants. Vegetation which is placed in above-ground pots or planters or boxes may be non-invasive, non-native ornamental plants; and

(d) ^s No permanent in-ground irrigation systems shall be installed on the canyon-facing portion of the site. Temporary above ground irrigation is allowed to establish plantings.

B. The permittee shall undertake development in accordance with the approved plan. Any proposed changes to the approved final plan 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 required.

3. Orange County Fire Authority Approval

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall provide to the Executive Director a copy of a permit issued by the Orange County Fire Authority (OCFA) or letter of permission, or evidence that no permit or permission is required. The applicant shall inform the Executive Director of any changes to the project required by the OCFA and/or any inconsistencies with the conditions of approval contained herein. Changes required by OCFA shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

4. Conformance with Grading and Drainage Plan Submitted

A. The applicant shall carry out development in conformance with the Grading and Drainage Plan prepared by Todd Schooler and Associates received April 30, 2003 and with all recommendations contained in the *Preliminary Geotechnical Investigation for Foundation Design, Proposed Duplex, 315 Cazador Lane, San Clemente, CA (Report No. 03-043)* prepared by ViaGeos Consulting Engineering Geologists dated April 14, 2003. In addition, the applicant shall comply with the following provisions:

- (a) Runoff from all roofs, patios, driveways and other impervious surfaces and slopes on the site shall be collected and discharged via pipe or other non-erosive conveyance to the frontage street or designated canyon outlet point to avoid ponding or erosion either on- or off- site;
- (b) Runoff shall not be allowed to pond adjacent to the structure or sheet flow directly over the sloping surface to the canyon bottom; and
- (c) The functionality of the approved drainage and runoff control plan shall be maintained throughout the life of the development.

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. Storage of Construction Materials, Mechanized Equipment and Removal of Construction Debris

The permittee shall comply with the following construction-related requirements:

- (a) No construction materials, debris, or waste shall be placed or stored where it may enter the storm drain system leading to the Pacific Ocean;
- (b) Any and all debris resulting from construction activities shall be removed from the project site within 24 hours of completion of the project;
- (c) Erosion control/sedimentation Best Management Practices (BMP's) shall be used to control sedimentation impacts to coastal waters during construction. BMPs shall include, but are not limited to: placement of sand bags around drainage inlets to prevent runoff/sediment transport into the storm drain system and a pre-construction meeting to review procedural and BMP guidelines;
- (d) Construction debris and sediment shall be removed from construction areas each day that construction occurs to prevent the accumulation of sediment and other debris which may be discharged into coastal waters. Debris shall be disposed of outside the coastal zone, as proposed by the applicant.

6. Future Development

- A. This permit is only for the development described in Coastal Development Permit No. 5-03-112. Pursuant to Title 14 California Code of Regulations Section 13253(b)(6), the exemptions otherwise provided in Public Resources Code Section 30610 (a) shall not apply to the entire parcel. Accordingly, any future improvements to the development authorized by this permit, including but not limited to repair and maintenance activities identified as requiring a permit in Public Resources Section 30610(d) and Title 14 California Code of Regulations Sections 13252(a)-(b), shall require an amendment to Permit No. 5-03-112 from the Commission or shall require an additional coastal development permit from the Commission or from the applicable certified local government.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. PROJECT LOCATION AND DESCRIPTION

The proposed project site is a vacant lot located at 315 Cazador Lane in the City of San Clemente, Orange County (Exhibits 1 & 2). The lot consists of a narrow level pad adjacent to the frontage street (Cazador Lane) and an approximately 40 foot high slope leading to Trafalgar Canyon. Surrounding development consists of low-density single-family residences. The nearest public access is available at the Municipal Pier, approximately ¼ mile northwest of the subject site.

The applicant proposes to construct a new three-story, 24 foot high, 4535 square foot, two-unit condominium complex with two 352 square foot, two-car garages (Exhibit 4). Unit A will consist of 2368 square feet of habitable area and Unit B will consist of 2167 square feet of habitable area. The applicant is also proposing rear yard decks supported by structural

pilasters, landscaping, and a railroad tie stair along the side yard. The stairway will not extend beyond the limit of the rear deck.

The City's certified LUP (Policy VII.15), to which the Commission may look for guidance, requires new development on coastal canyon lots to be set back as follows:

"New development shall not encroach into coastal canyons and shall be set back either: a. a minimum of 30% of the depth of the lot, and not less than 15 feet from the canyon edge; or b. a minimum of 30% of the depth of the lot, and set back from the line of native vegetation (not less than 15 feet from coastal sage scrub vegetation or not less than 50 feet from riparian vegetation); or c. in accordance with house and deck/patio stringlines drawn between the nearest corners of the adjacent structures.

The development setback shall be established depending on site characteristics."

The proposed development conforms to the canyon setback policies in the certified LUP, as development will be set back in accordance with the structural stringline. The project is consistent with the pattern of development in the surrounding area and will not result in canyonward encroachment beyond the structural limits of the adjoining structures.

San Clemente's certified LUP advocates the preservation of native vegetation and discourages the introduction of non-native vegetation in coastal canyons. While no rare or endangered species have been reported to exist within the coastal canyon habitat of San Clemente, the City has designated all coastal canyons, including Trafalgar Canyon, as environmentally sensitive habitat areas. The coastal canyons act as open space and potential wildlife habitat, as well as corridors for native fauna. Decreases in the amount of native vegetation due to displacement by non-native vegetation have resulted in cumulative adverse impacts upon the habitat value of the canyons. As such, the quality of canyon habitat must be assessed on a site-by-site basis. The canyon adjacent to the subject site is considered somewhat degraded due to the presence of both native and non-native plant species. The site is currently covered with non-native shrubs and grasses. No information has been provided to indicate that the site or any portion thereof qualifies as ESHA. The applicant proposes to landscape with native willows, shrubs and trees to improve the habitat value of the adjacent canyon. According to the applicant, plant material has been chosen for its drought tolerance, as well as its fire retardation. As part of the fuel modification program for the subject site, a 20' "wet zone" is proposed adjacent to the structure within the rear yard (canyon-facing). To avoid excessive water application and saturation of the slope, no permanent in-ground irrigation systems may be installed on the canyon-facing portion of the site. Temporary above ground irrigation is allowed to establish plantings.

During construction, the applicant will be required to implement best management practices (BMPs) designed to minimize erosion and prevent debris from entering the storm drain system leading to the ocean. After construction, impervious surface runoff will be directed to the street. Trench drains and an atrium drain are proposed along the front (streetside) of the project, which will capture roof and driveway runoff. Deck runoff will be conveyed via pipe to a gravel filter along the lower canyon slope.

B. GEOLOGIC HAZARDS

Development adjacent to slopes such as those found on canyons or hillsides is inherently hazardous. Development which may require a protective device in the future can not be allowed due to the adverse impacts such devices have upon public access, and visual resources. To minimize risks to life and property the development has been conditioned to

require: adherence to the geotechnical recommendations, conformance with the drainage and runoff control plan to minimize percolation of water into the slope, conformance with the landscaping plan. Additionally, future improvements must come back to the Commission for review. As conditioned, the Commission finds that the development conforms to the requirements of Sections 30235 and 30253 of the Coastal Act regarding the siting of development in hazardous locations.

C. HABITAT, RECREATION AND PARK IMPACTS

As conditioned, the development will not result in significant degradation of adjacent habitat, recreation areas, or parks and is compatible with the continuance of those habitat, recreation, or park areas. Therefore, the Commission finds that the project, as conditioned, conforms to Section 30240(b) of the Coastal Act.

D. WATER QUALITY

The proposed work will be occurring in a location where there is a potential for a discharge of polluted runoff from the project site into coastal waters. The storage or placement of construction material, debris, or waste in a location where it could be carried into coastal waters would result in an adverse effect on the marine environment. To reduce the potential for construction and post-construction related impacts on water quality, the Commission imposes special conditions requiring, but not limited to, the appropriate storage and handling of construction equipment and materials to minimize the potential of pollutants to enter coastal waters and for the use of on-going best management practices following construction. As conditioned, the Commission finds that the development conforms to Sections 30230 and 32031 of the Coastal Act.

E. PUBLIC ACCESS

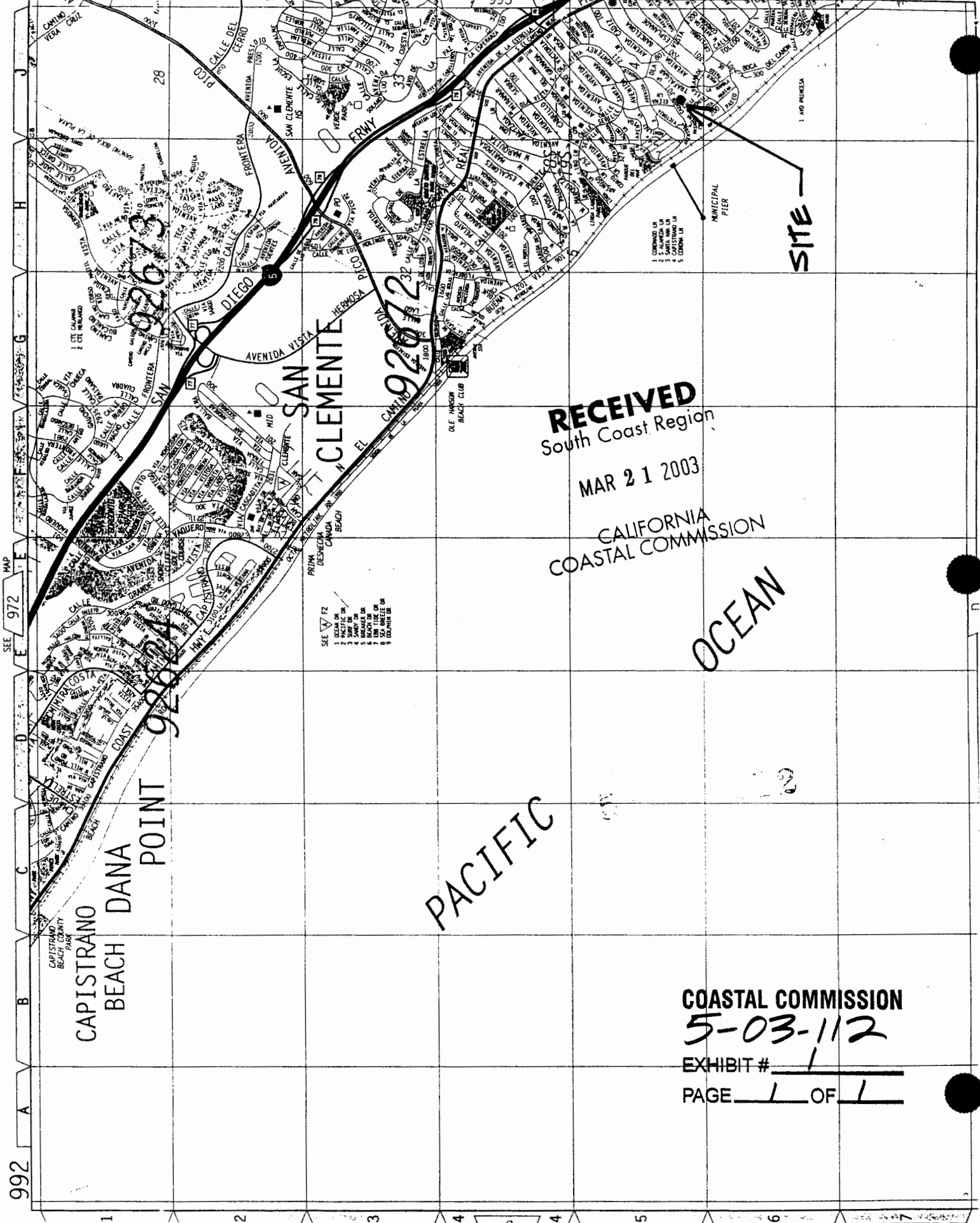
The proposed development will not affect the public's ability to gain access to, and/or to use the coast and nearby recreational facilities. Therefore, as proposed, the development conforms to Sections 30210 through 30214, Sections 30220 through 30224, and 30252 of the Coastal Act.

F. LOCAL COASTAL PROGRAM

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 Implementation Plan portion of the Local Coastal Program. The suggested modifications expired on October 10, 1998. The City re-submitted on June 3, 1999, but withdrew the submittal on October 5, 2000. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act and with the certified Land Use Plan for the area. Approval of the project, as conditioned, will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

As conditioned, there are no feasible alternatives or feasible mitigation measures available 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 impacts, is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.



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OCEAN

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5-03-112

EXHIBIT # 1

PAGE 1 OF 1

SEE 972 MAP

992

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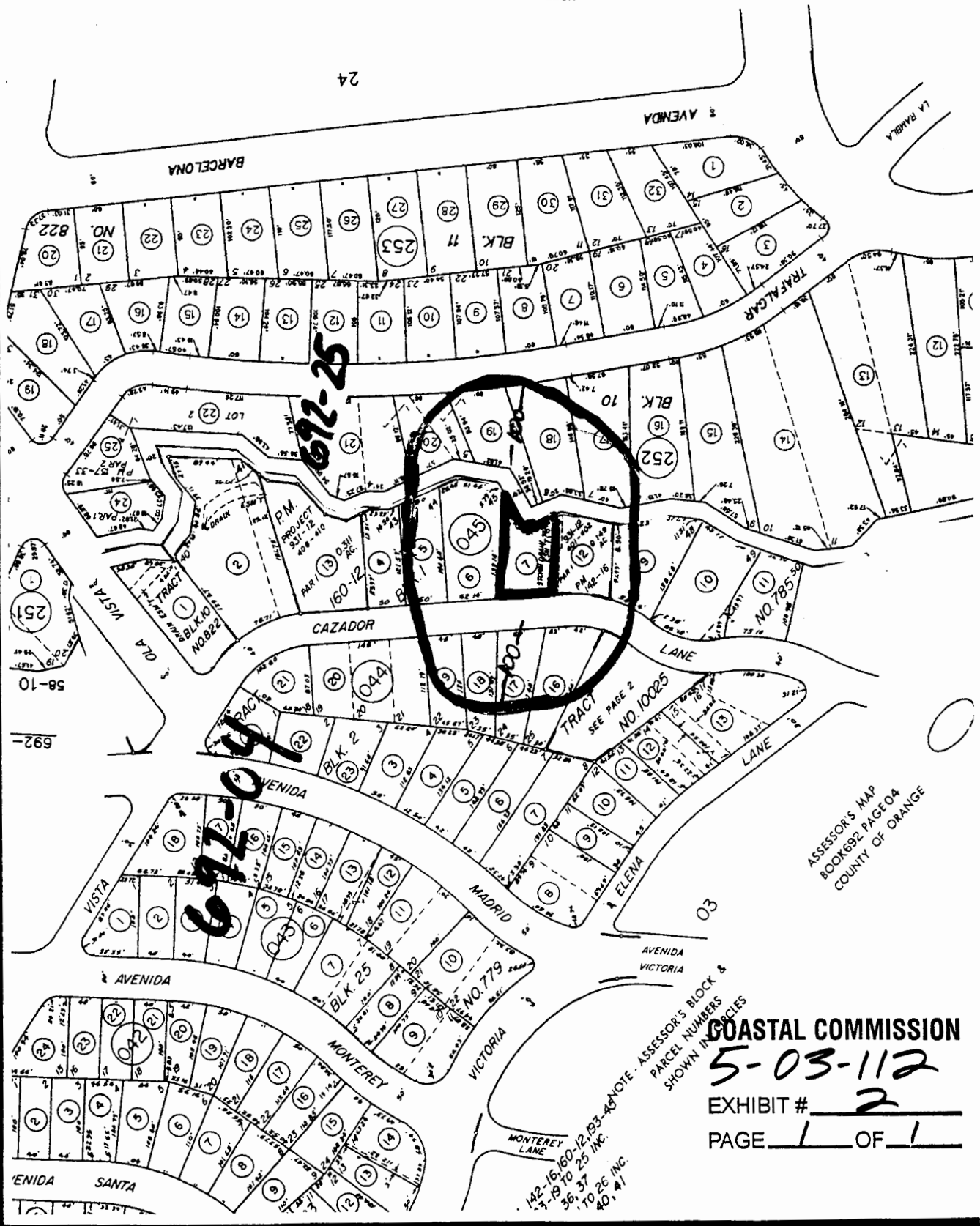
9

10

ASSESSOR'S MAP
BOOK 692 PAGE 25
COUNTY OF ORANGE

NOTE - ASSESSOR'S BLOCK &
PARCEL NUMBERS
SHOWN IN CIRCLES

M.M. 25-21 TO 26 INC.
P.M. 157-33

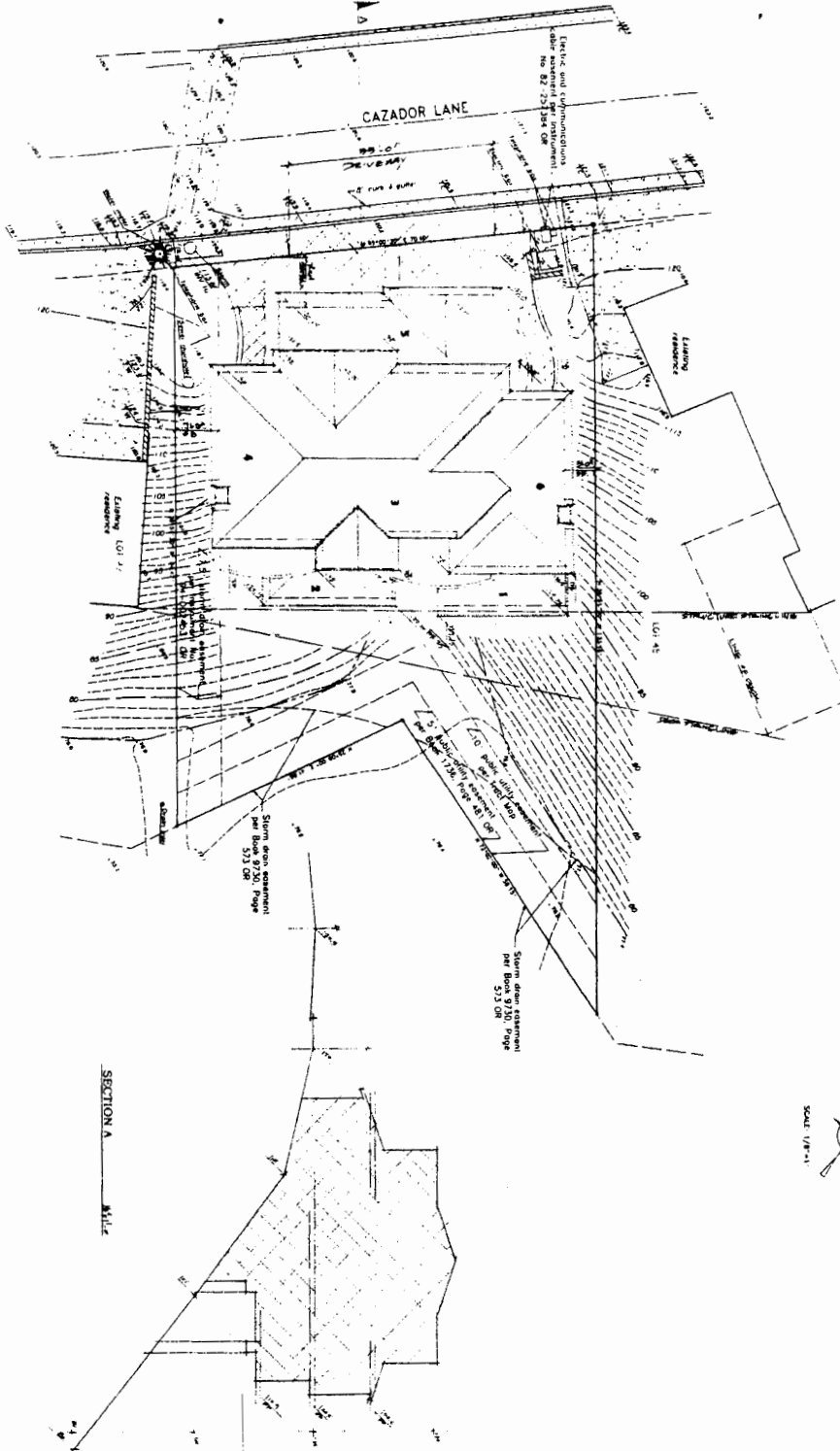


ASSESSOR'S MAP
BOOK 692 PAGE 04
COUNTY OF ORANGE

142-16, 160-12, 193-45 NOTE - ASSESSOR'S BLOCK &
PARCEL NUMBERS
SHOWN IN CIRCLES
3-19 TO 25 INC.
36, 37
10 26 INC.
40, 41

COASTAL COMMISSION
5-03-112
EXHIBIT # 2
PAGE 1 OF 1

Ownership Map



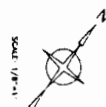
ROOF PLAN TYPICAL NOTES

ROOF PLAN KEYNOTES

ROOF LEGEND

1/2" = 1'-0"	1/4" = 1'-0"	1/8" = 1'-0"	1/16" = 1'-0"
1/32" = 1'-0"	1/64" = 1'-0"	1/128" = 1'-0"	1/256" = 1'-0"
1/512" = 1'-0"	1/1024" = 1'-0"	1/2048" = 1'-0"	1/4096" = 1'-0"

SECTION A
 MILE

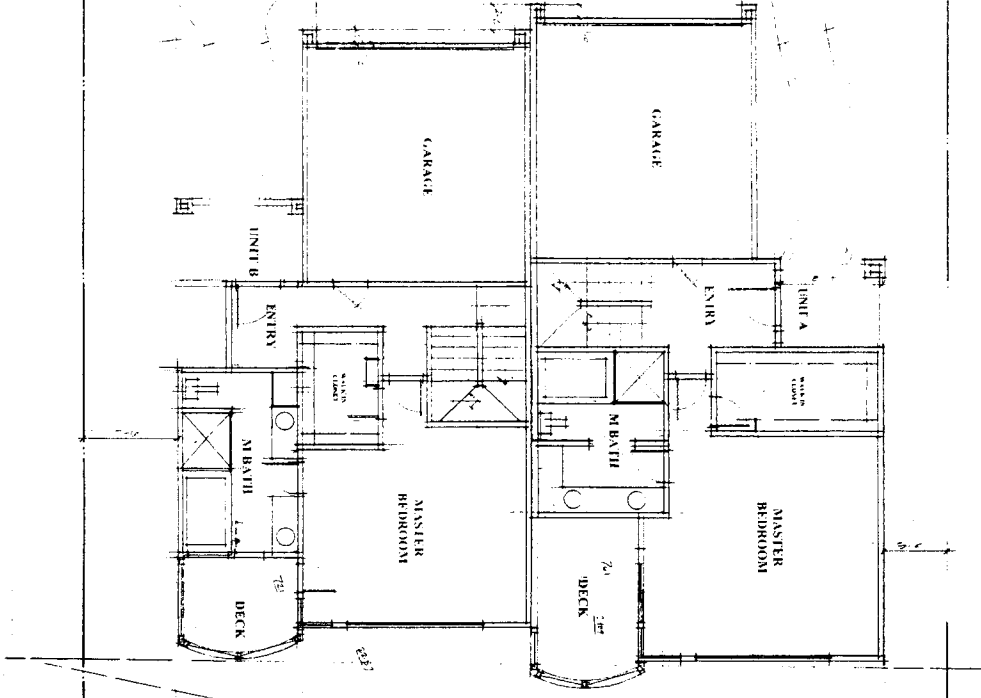


ROOF/SITE PLAN SCALE 1/8" = 1'-0"

<p>Copyright Todd Schuster & Associates Architects & Planners</p> <p>Todd Schuster</p>	<p>Project Location :</p> <p>315 CAZADOR LANE SAN CLEMENTE, CA</p>	<p>TWO CUSTOM DWELLING UNITS FOR: DIADEMARE, LLC 301 EAST 17TH STREET SUITE 204 COSTA MESA, CA 92627</p>
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CAZADOR LANE

COASTAL COMMISSION
5-03-12
EXHIBIT # 3
PAGE 2 OF 8



MID-LEVEL FLOOR PLAN



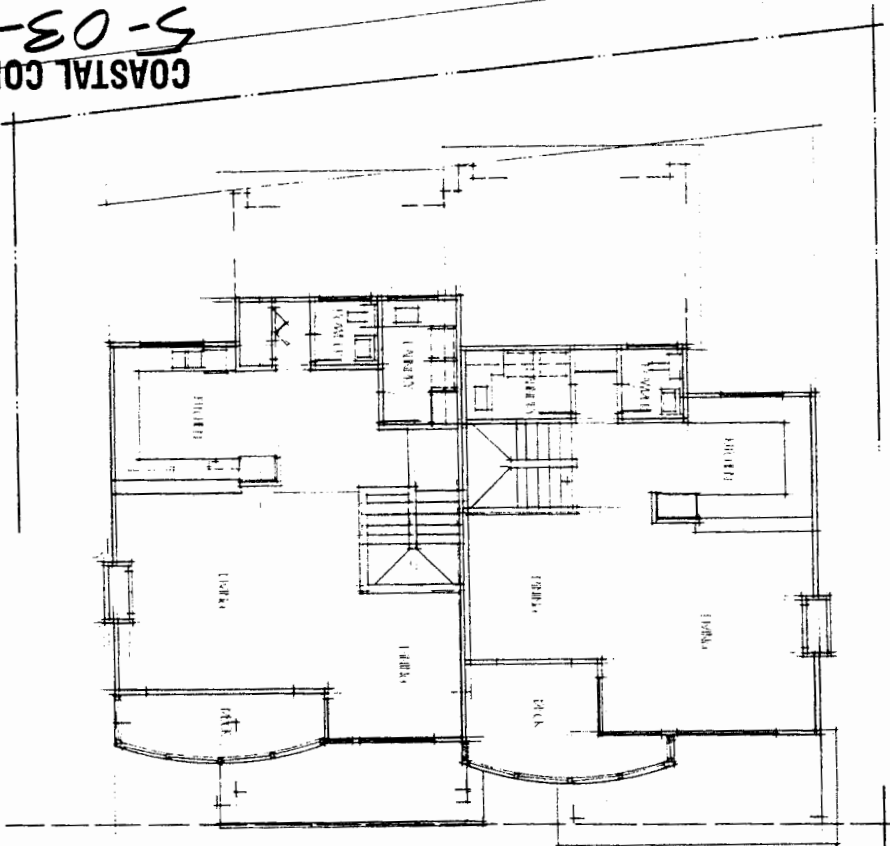
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Project # 2012-001
Sheet # 2

Todd Schooner
ARCHITECTS & PLANNERS

Project Location :

315 CAZADOR LANE
SAN CLEMENTE, CA

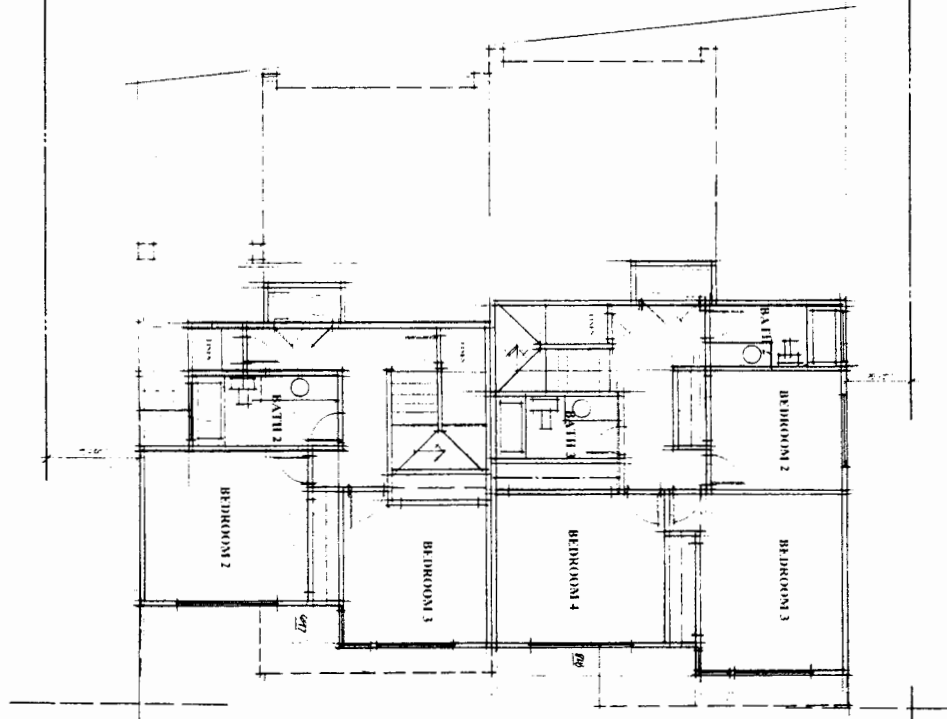
TWO CUSTOM DWELLING UNITS FOR:
DIADEMARE, LLC
301 EAST 17TH STREET SUITE 204
COSTA MESA, CA 92627



UPPER LEVEL FLOOR PLAN



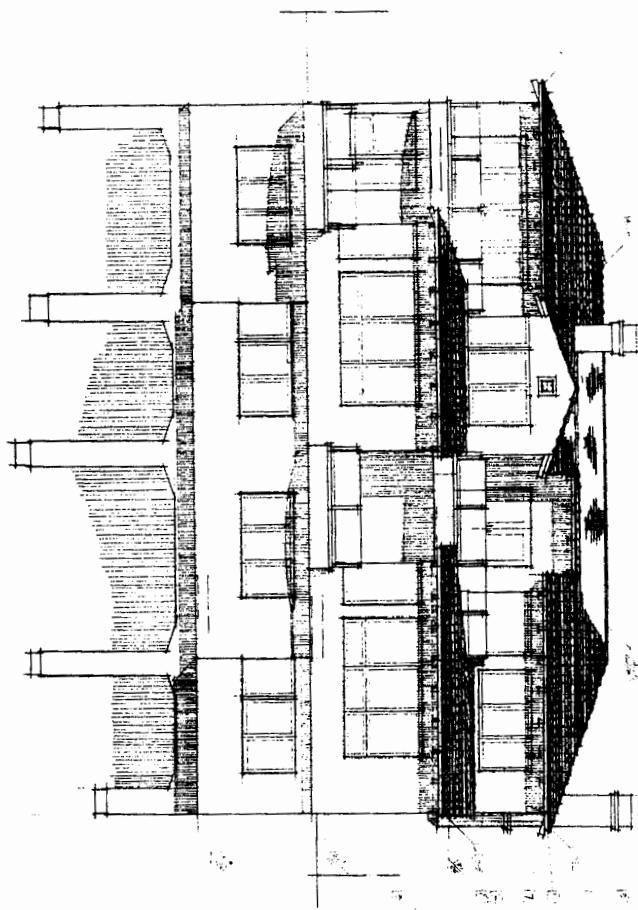
<p>Copyright Todd Schooner & Associates Architects & Planners</p> <p>Todd Schooner</p>	<p>Project Location :</p> <p>315 CAZADOR LANE SAN CLEMENTE, CA</p>	<p>TWO CUSTOM DWELLING UNITS FOR: DIADEMARE, LLC 301 EAST 17TH STREET SUITE 204 COSTA MESA, CA 92627</p>
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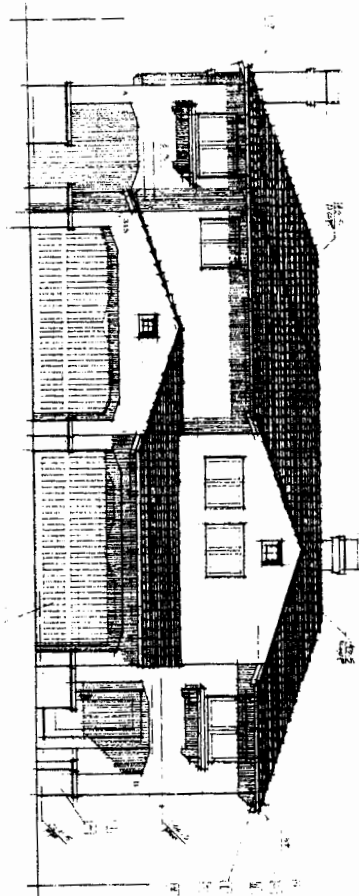
LOWER LEVEL FLOOR PLAN



<p>Copyright Todd Schuster & Associates Architects & Planners</p> <p>Todd Schuster</p>	<p>Project Location :</p> <p>315 CAZADOR LANE SAN CLEMENTE, CA</p>	<p>TWO CUSTOM DWELLING UNITS FOR: DIADEMARE, LLC 301 EAST 17TH STREET SUITE 204 COSTA MESA, CA 92627</p>
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SOUTH ELEVATION



NORTH ELEVATION

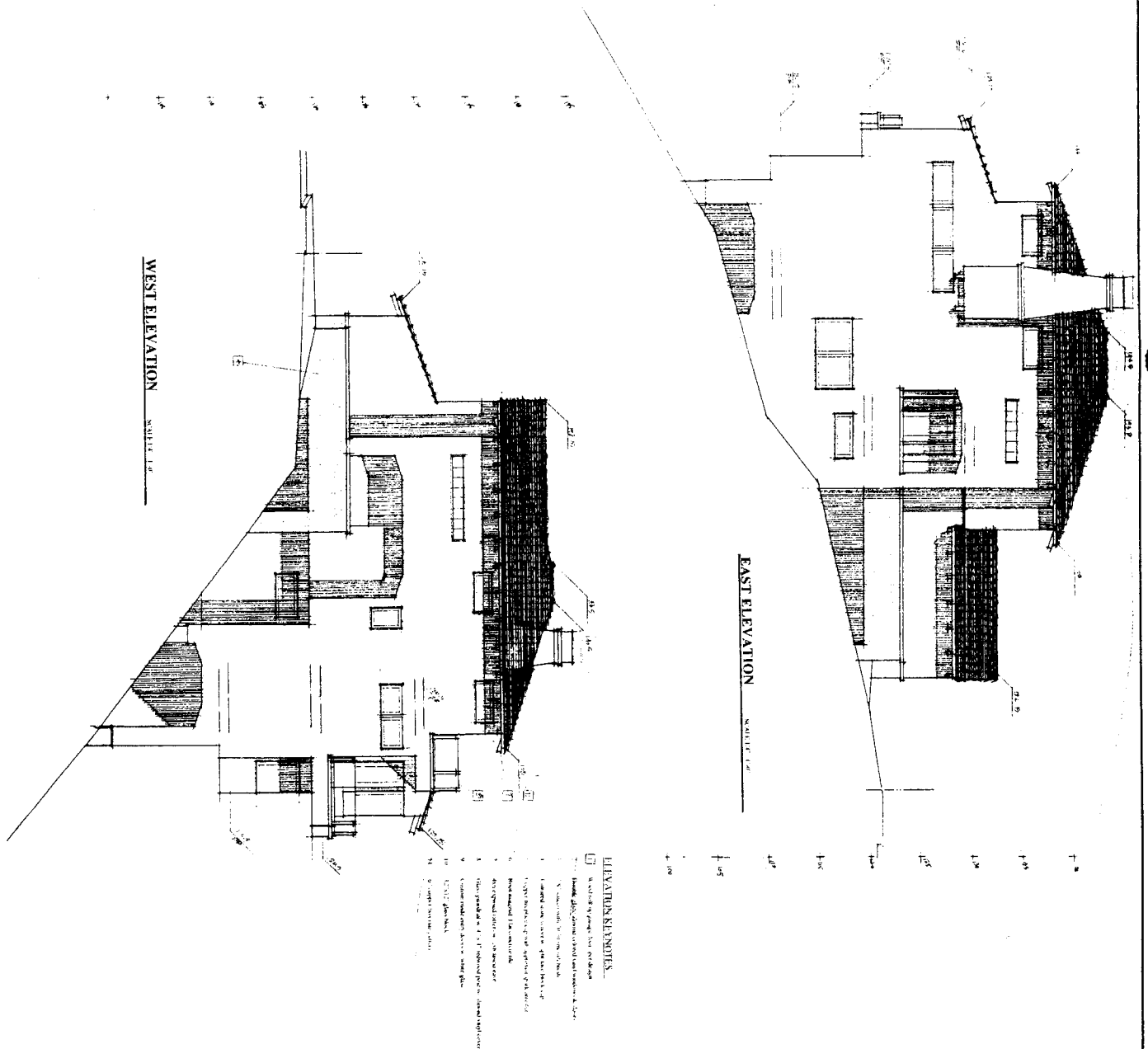
- ELEVATION SYMBOLS
- 1. Material of finish for the roof
 - 2. Material of finish for the exterior walls
 - 3. Material of finish for the interior walls
 - 4. Material of finish for the floor
 - 5. Material of finish for the ceiling
 - 6. Material of finish for the stairs
 - 7. Material of finish for the balcony
 - 8. Material of finish for the porch
 - 9. Material of finish for the driveway
 - 10. Material of finish for the sidewalk
 - 11. Material of finish for the fence
 - 12. Material of finish for the gate

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Project Location :
 315 CAZADOR LANE
 SAN CLEMENTE, CA

TWO CUSTOM DWELLING UNITS FOR:
 DIADRE MARE, LLC
 301 EAST 17TH STREET SUITE 204
 COSTA MESA, CA 92627



DATE	DESCRIPTION

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Project Location :
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 SAN CLEMENTE, CA

TWO CUSTOM DWELLING UNITS FOR:
 DIADEMARE, LLC
 301 EAST 17TH STREET SUITE 204
 COSTA MESA, CA 92627

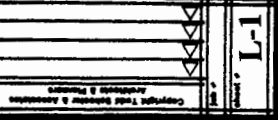
TWO CUSTOM DWELLING UNITS FOR:
 DIADREME, LLC
 301 EAST 17TH STREET SUITE 204
 COSTA MESA, CA 92627



315 CAZADOR LANE
 SAN CLEMENTE, CA

Project Location :

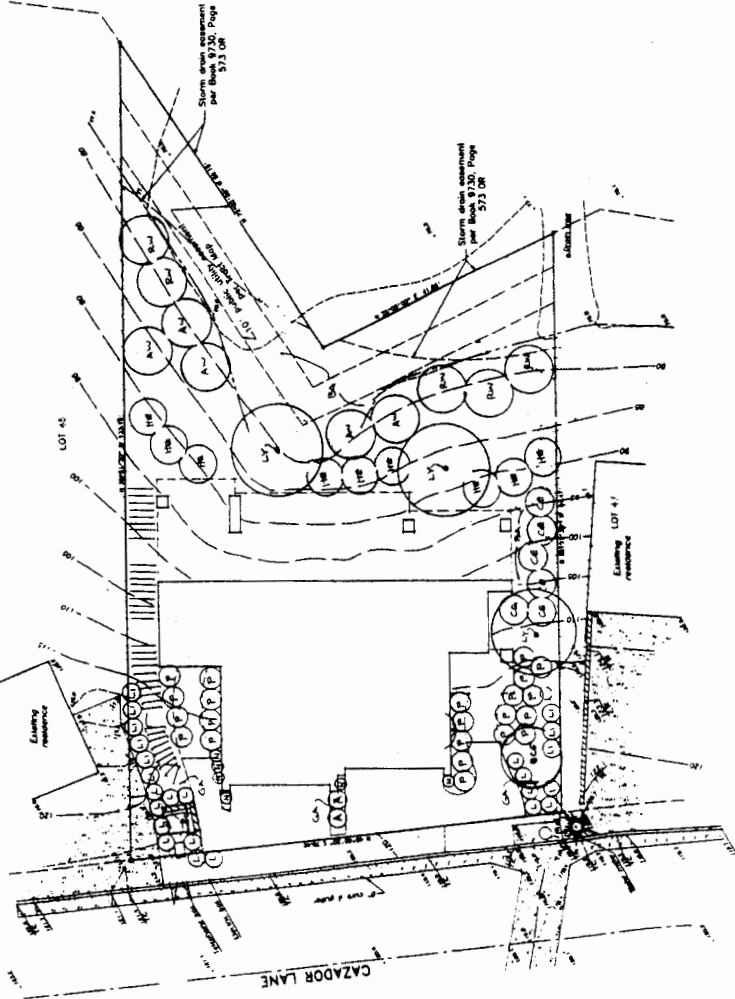
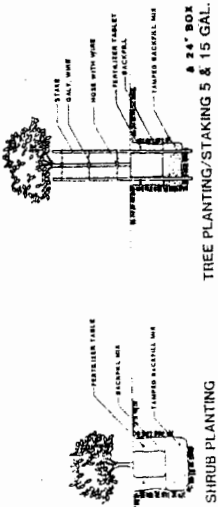
Todd Schooker



LANDSCAPE PLAN
 REV. 03.13.2012

PLANT LEGEND

CE	CELANOTHUS 'SILVER DUST'	15 gal
LY	LYNCHIA CALIFORNICA	15 gal
RY	RYTHYMIS TERRESTRIS	15 gal
AV	AVICENNIA CASUALIS	15 gal
A	ANEMONE 'MILK AND HONEY'	15 gal
CE	CELANOTHUS 'SILVER DUST'	15 gal
HE	HETEROMELES AMPHIBOLIA	15 gal
L	LAVANDULA 'PROVENCE'	15 gal
LI	LIPTONIA TENUIS	15 gal
NA	NANDINA DOMESTICA	15 gal
P	PITTOSPORUM 'VARIATA'	15 gal
SA	SANTALUM 'SANTALUM'	15 gal
GA	GAZANIA 'SUNSHINE YELLOW'	15 gal



ENVIRONMENTAL CONSTRAINTS & PROPOSED MITIGATIONS

- THE PROPERTY CONTAINS PUBLIC UTILITY LINES AND/OR OTHER FEATURES WHICH MAY BE AFFECTED BY THE PROPOSED DEVELOPMENT. THE CLIENT SHALL OBTAIN NECESSARY PERMITS AND APPROVALS FROM THE APPROPRIATE AGENCIES.
- THE PROPOSED DEVELOPMENT SHALL BE DESIGNED TO MINIMIZE IMPACTS ON THE ENVIRONMENT AND TO PRESERVE AND ENHANCE THE NATURAL AND CULTURAL RESOURCES OF THE AREA.
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PLANTING NOTES

- ALL PLANTING SHALL BE DONE IN ACCORDANCE WITH THE CALIFORNIA PLANTING STANDARDS AND SPECIFICATIONS.
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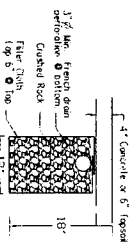
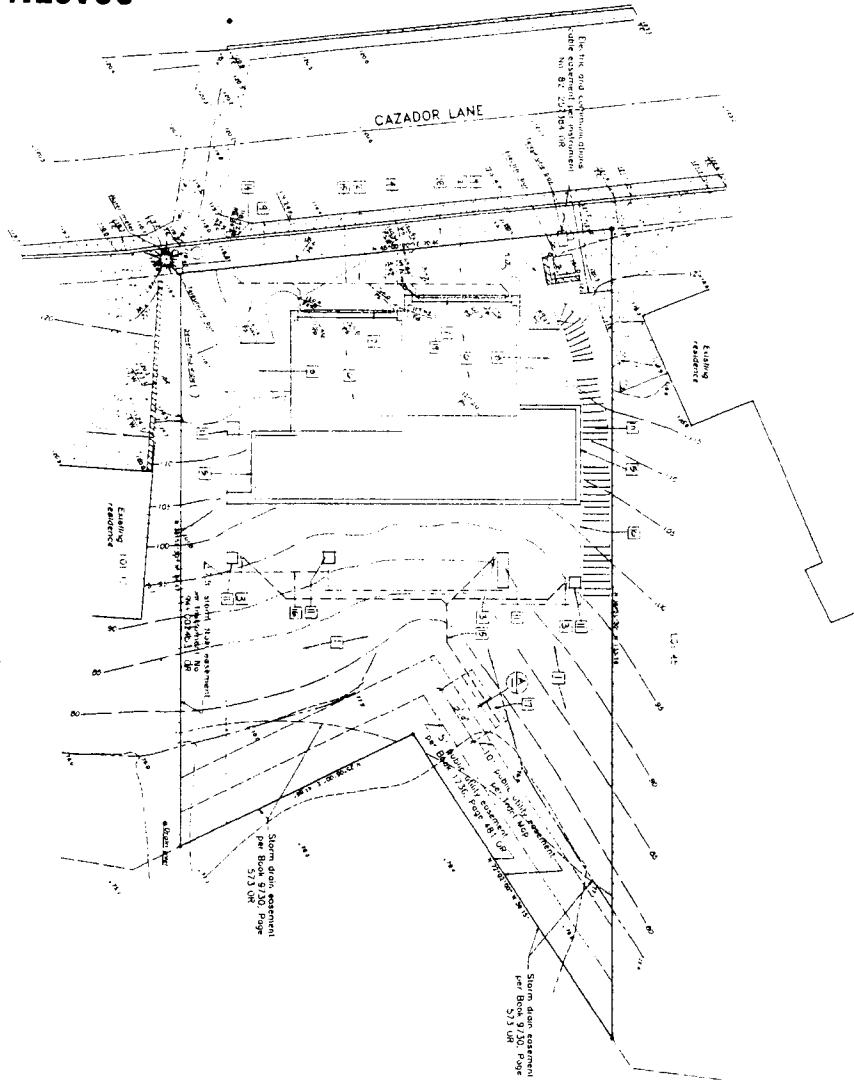
STAKING NOTES

- ALL STAKING SHALL BE DONE IN ACCORDANCE WITH THE CALIFORNIA STAKING STANDARDS AND SPECIFICATIONS.
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GENERAL NOTES

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COASTAL COMMISSION
 5-03-112
 EXHIBIT # 3
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A GRAVEL FILTER

GRADING PLAN KEYNOTES:

1. All elevations are in feet above mean sea level.
2. All spot elevations are shown to two decimal places.
3. All elevations are shown to the nearest 0.05 feet.
4. All elevations are shown to the nearest 0.10 feet.
5. All elevations are shown to the nearest 0.20 feet.
6. All elevations are shown to the nearest 0.50 feet.
7. All elevations are shown to the nearest 1.00 feet.
8. All elevations are shown to the nearest 2.00 feet.
9. All elevations are shown to the nearest 5.00 feet.
10. All elevations are shown to the nearest 10.00 feet.
11. All elevations are shown to the nearest 20.00 feet.
12. All elevations are shown to the nearest 50.00 feet.
13. All elevations are shown to the nearest 100.00 feet.
14. All elevations are shown to the nearest 200.00 feet.
15. All elevations are shown to the nearest 500.00 feet.
16. All elevations are shown to the nearest 1000.00 feet.
17. All elevations are shown to the nearest 2000.00 feet.
18. All elevations are shown to the nearest 5000.00 feet.
19. All elevations are shown to the nearest 10000.00 feet.
20. All elevations are shown to the nearest 20000.00 feet.
21. All elevations are shown to the nearest 50000.00 feet.
22. All elevations are shown to the nearest 100000.00 feet.
23. All elevations are shown to the nearest 200000.00 feet.
24. All elevations are shown to the nearest 500000.00 feet.
25. All elevations are shown to the nearest 1000000.00 feet.

GRADING PLAN SCALE: 1/8" = 1'

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