

**CALIFORNIA COASTAL COMMISSION**

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

**T16b**

Filed: February 17, 2006  
49th Day: April 7, 2006  
180th Day: August 16, 2006  
Staff: Anne Blemker-LB  
Staff Report: May 25, 2006  
Hearing Date: June 13-16, 2006  
Commission Action:

**STAFF REPORT: REGULAR CALENDAR**

**APPLICATION NUMBER:** 5-05-477

**APPLICANT:** Steven and France Helfer

**PROJECT LOCATION:** 1210 Calle Toledo, San Clemente, Orange County

**PROJECT DESCRIPTION:** Addition to existing single-family residence, including 233 square foot second story addition and replacement of 118 square foot rear yard deck with new 238 square foot deck on a coastal canyon lot.

**LOCAL APPROVALS RECEIVED:** City of San Clemente Planning Division Approval in Concept dated October 26, 2005

**SUBSTANTIVE FILE DOCUMENTS:** City of San Clemente Certified Land Use Plan; CDP 5-04-436 (Bohi).

**SUMMARY OF STAFF RECOMMENDATION:**

Staff is recommending **APPROVAL** of the proposed project with five (5) special conditions which require 1) submittal of a revised site plan; 2) use of construction best management practices (BMPs); 3) submittal of drainage and runoff control plan; 4) informs the applicant that any future change in the density or intensity of use of the site will require a permit amendment or new permit; and 5) a deed restriction recording the requirements of the permit. The major issues associated with this development are sensitive resources and water quality, and the presence of unpermitted development on the site.

**LIST OF EXHIBITS:**

1. Location Map
2. Assessor's Parcel Map
3. Proposed Project Plans
4. Vegetation Survey/Existing Encroachments
5. Coastal Canyons
6. Coastal Access Points

**STAFF RECOMMENDATION:**

Staff recommends that the Commission **APPROVE** the permit application with special conditions.

**MOTION:**

*I move that the Commission approve CDP No. 5-05-477 pursuant to the staff recommendation.*

Staff recommends a **YES** vote. This will result in adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of 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. Submittal of Revised Final Plans

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and written approval, two (2) sets of final site and building plans that substantially conform with the plans by Arthur R. Schiller-Architect, Inc. dated January 17, 2003, but shall be revised to include the following:

1) The detached patio and stairs located beyond (canyonward) of the canyon edge shall be clearly depicted, shaded and marked "THESE ELEMENTS NOT PERMITTED BY ANY COASTAL DEVELOPMENT PERMIT" on the plans.

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

#### 2. 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 (BMPs) 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.

#### 3. Submittal of Final Drainage and Runoff Control Plan

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, in a form and content acceptable to the Executive Director, two (2) sets of a final drainage and runoff control plan prepared by an appropriately licensed professional. The plan shall incorporate the following criteria:

- 1) Runoff from all roofs, patios, driveways and other impervious surfaces and slopes on the site shall be directed to dry wells or vegetated/landscaped areas to the maximum extent practicable within the constraints of City requirements.
  - 2) Where City code prohibits on-site infiltration, runoff shall be collected and discharged via pipe or other non-erosive conveyance to the frontage street to the maximum extent practicable. Runoff from impervious surfaces that cannot feasibly be directed to the street shall be discharged via pipe or other non-erosive conveyance to a designated canyon outlet point to avoid ponding or erosion either on- or off- site;
  - 3) Runoff shall not be allowed to pond adjacent to the structure or sheet flow directly over the sloping surface to the canyon bottom; and
  - 4) 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.

#### 4. Future Development

This permit is only for the development described in Coastal Development Permit No. 5-05-477. Pursuant to Title 14 of the California Code of Regulations, Section 13250(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. 5-05-477 from the Commission or shall require an additional coastal development permit from the Commission or from the applicable certified local government.

#### 4. 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.

#### **IV. FINDINGS AND DECLARATIONS:**

The Commission hereby finds and declares:

##### **A. PROJECT DESCRIPTION**

The proposed project site is located at 1210 Calle Toledo in the City of San Clemente, Orange County (Exhibits 1 & 2). The site consists of a flat pad on the north side of the lot, which slopes down towards Toledo Canyon to the south. There is an existing, approximately 4,200 square foot 2-story single-family residence on the site. Surrounding development consists of low-density single-family residences. The site is designated as Residential Low (7 dwelling units per acre) in the certified Land Use Plan, and the proposed addition is consistent with this designation.

The applicant proposes to remodel and enlarge the existing single-family residence, including a 233 square foot second story addition and replacement of a 118 square foot rear yard deck with a new 238 square foot deck on the canyon side of the structure (Exhibit 3).

The project plans submitted contain handwritten notes from City of San Clemente Planning Department staff stating that there is an illegal patio and stairs within the coastal canyon that are to be removed as part of the current proposal. The project description initially submitted by the applicant makes no mention of the patio and stair removal. When asked about removal of the encroachments, the applicant submitted a letter stating:

*“Even though the patio and stairs are unpermitted, that does not make them illegal. Exhibit 1), a letter from the California Coastal Commission, dated July 31, 1996 states: ‘This development does require a coastal development permit...However, our office will make no further efforts to require an after-the-fact permit for this development and has closed the investigation...if you would like to legalize the existing development, you may use the enclosed application.’”*

Commission staff disagrees with the applicant's interpretation of the quoted letter. Clearly, because an action is necessary to legalize the existing unpermitted detached stairs and patio, i.e. as stated in the quoted letter, submission of an application for a coastal development permit authorizing the development, then the existing development is not in fact legal. Nor is it certain that staff would recommend approval of the patio and stairs. In fact, the 15-foot canyon setback requirement may preclude a recommendation of approval.

Also, as a practical matter, Commission staff must have discretion to determine which violations of the Coastal Act warrant enforcement action. While theoretically, the Commission could take action to address every Coastal Act violation, given staffing

constraints, this is simply not possible. Thus, the decision not to pursue a particular alleged violation does not in any way legitimize the unpermitted development.

The applicant does not propose to remove the unpermitted patio and stairway encroachments shown on the Vegetation Survey in Exhibit 4. It is the applicant's intent to appeal to the City Council to authorize retention of the patio and stairs prior to obtaining local building permits for the proposed structural improvements to the residence. Although the Commission supports the Planning Department's effort to have the canyon encroachments removed (which are inconsistent with the canyon setback policies in the certified LUP), the existing encroachments are not a part of the current proposal. The current application only involves improvements that are sited in accordance with the minimum 15' setback from the canyon edge. Commission approval of the current application does not constitute approval of any unpermitted development located on the subject site. The Commission's enforcement division will evaluate further actions to address this matter.

## **B. ENVIRONMENTALLY SENSITIVE HABITAT AREA (ESHA)**

### **1. Coastal Act and Land Use Plan (LUP) Policies**

Section 30240 of the Coastal Act states:

- (a) *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
- (b) *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

San Clemente's certified Land Use Plan (LUP) discusses the importance of coastal canyons and states:

*In most cases, coastal canyons are designated for natural open space, which limits potential development and helps to ensure preservation.*

Policy VII.12 of the certified LUP states:

*Encourage activities which improve the natural biological value, integrity and corridor function of the coastal canyons through vegetation restoration, control of alien plants and animals, and landscape buffering.*

Policy XV.13 of the certified LUP states:

*The removal of native vegetation and the introduction of non-native vegetation in the canyons shall be minimized. The use of native plant species in and adjacent to the canyons shall be encouraged.*

The policy in the certified LUP concerning setbacks on coastal canyons is found in Chapter 3, Section 302 G, policy VII.15, and states:

*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 canyon adjacent to the subject site (Toledo Canyon, Exhibit 5) is considered somewhat degraded due to the presence of both native and non-native plant species. No portion of the applicant's development area contains resources that rise to the level of ESHA. Nevertheless, preservation and enhancement of the City's coastal canyons is a goal supported by both the environmental protection policies of the Coastal Act, and the certified LUP. Encroachment into the canyon by development increases the potential for the introduction of non-native plant species, and predation of native species by domestic animals, and destabilization of the canyon from excess irrigation. Encroaching development also threatens the visual quality of the canyons. The above-cited policies of the LUP were designed to ensure that encroachment into the canyons and impacts to resources are minimized to the greatest extent feasible.

In the case of the proposed project, the appropriate setback for the development on the site is the 15-foot setback from the canyon edge. A string line setback is not appropriate due to the configuration of the lot in relationship to adjacent lots. The existing residential structure and attached deck conform to the 15-foot setback requirement. However, a detached patio and stairway have been constructed on the site up to 15 feet beyond the canyon edge without the benefit of a coastal development permit. As stated previously, the applicant has not proposed to remove the encroachments, nor has a request been made for after-the-fact authorization of the patio and stairway. The Commission's enforcement division will evaluate further actions to address this matter (see Section E of this report). Therefore, the Commission is requiring Special Condition No. 1. To ensure that there is no confusion regarding the development that has been approved and the development that has not been approved on the site, Special Condition No. 1 requires submittal of revised plans indicating that the patio and stairway are not permitted development.

In contrast, the newly proposed addition to the residence and the new deck would be in conformance with the setback policies of the certified LUP. The new deck and second story structural addition will be sited 17 feet from the canyon edge.

The project does not involve any landscaping. As such, submittal of a landscaping plan was not required. Nevertheless, because the site is located adjacent to a canyon, Commission staff recommended the project plans be submitted to the Orange County Fire Authority (OCFA) for review to confirm that development will be carried out in conformance with OCFA requirements. OCFA provided a letter stating that there will be no requirement for review and approval of plans for the proposed project due to the amount of square footage being added to the structure and the presence of an existing defensible space between the structures and the canyon.

To ensure that no development occur without an approved amendment to this coastal development permit or approval of a new coastal development permit, the Commission imposes Special Condition No. 4. Special Condition No. 4 requires that an amendment to this permit or a new coastal development permit be obtained for any improvements beyond those described in this permit. This would allow the Commission to evaluate future development for potential impacts to canyon habitat.

Special Condition No. 5 is imposed to require the applicant to record a deed restriction against the property so as to notify all prospective future property owners of the terms and conditions of approval to which they will also be required to adhere.

In summary, the proposed residential addition will not result in further canyon encroachment and will be consistent with the pattern of development in the subject area. The conditions make clear that existing canyon encroachments are not proposed or approved as a part of the current application. As conditioned, the project will not have any adverse impact on sensitive biological resources, consistent with the certified LUP and the Chapter 3 policies of the Coastal Act.

### **C. WATER QUALITY**

Section 30230 of the Coastal Act states, in pertinent part:

*Marine resources shall be maintained, enhanced, and where feasible, restored...*

Section 30231 of the Coastal Act 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.*

During construction, the applicant will be required to implement best management practices (BMPs) designed to minimize erosion and prevent debris from entering the adjacent canyon or storm drain system (Special Condition No. 2). After construction, roof



and surface runoff from new impervious areas should, ideally, be directed to dry wells or vegetated/landscaped areas. However, the Commission recognizes that, at present, City codes mandate directing certain types of runoff, such as roof runoff, to the street. Until there is a reconciliation between City codes and the goal of maximizing on-site treatment and infiltration of runoff for water quality purposes, site runoff should be directed to dry wells or vegetated/landscaped areas to the maximum extent practicable, but within the constraints of City requirements. Therefore, Special Condition No. 3 requires submittal of a drainage and runoff control plan prior to permit issuance.

Combined with the use of existing landscaped areas to treat the runoff discharged from the site, the project will minimize the project's adverse impact on coastal waters to such an extent that it will not have a significant impact on marine resources, biological productivity or coastal water quality. Therefore, the Commission finds that the proposed development, as conditioned, conforms to Sections 30230 and 30231 of the Coastal Act regarding the protection of water quality to protect marine resources, promote the biological productivity of coastal waters and to protect human health.

#### **D. PUBLIC ACCESS**

Section 30212(a)(2) of the Coastal Act states, in pertinent part:

*(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:*

*(2) adequate access exists nearby*

The nearest public access is available at the Boca del Canon access point, approximately ¼ mile southwest of the subject site (Exhibit 6). The proposed development does not impact access either directly or indirectly to the ocean. As such, the development will not create adverse impacts, either individually or cumulatively, on public access and will not block public access from the first public road to the shore. Adequate access exists nearby. Therefore, the Commission finds that the proposed development is consistent with Section 30212 of the Coastal Act.

#### **E. UNPERMITTED DEVELOPMENT**

Development has occurred on site without the required coastal development permit, including a detached patio and stairway beyond the canyon edge. Removal of the patio and stairway encroachments is not addressed by this application. The Commission's enforcement division will evaluate further actions to address this matter.

Although development has taken place prior to submission of this permit application, consideration of the permit application by the Commission has been based solely on the consistency of the proposed development with the policies of Chapter 3 of the Coastal Act. Commission action on this permit does not constitute a waiver of any legal action with regard any alleged unpermitted development, nor does it constitute admission as to the legality of any development undertaken on the subject site without a coastal development permit.

**F. LOCAL COASTAL PROGRAM**

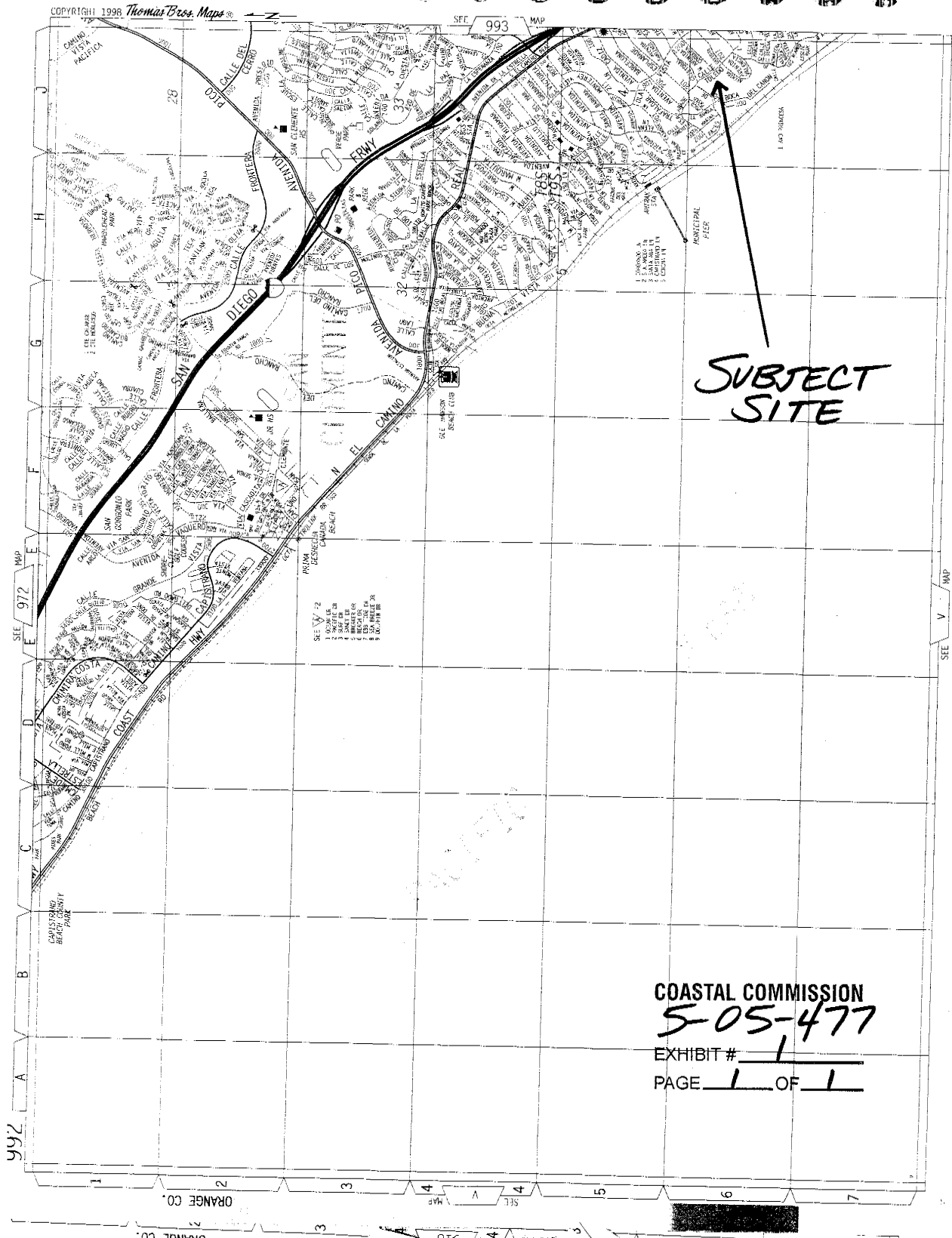
Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal development permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program that conforms with Chapter 3 policies of the Coastal Act. The Commission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

The proposed development is consistent with the policies contained in the certified Land Use Plan. Moreover, as discussed herein, the development, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. 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).

**G. CONSISTENCY WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

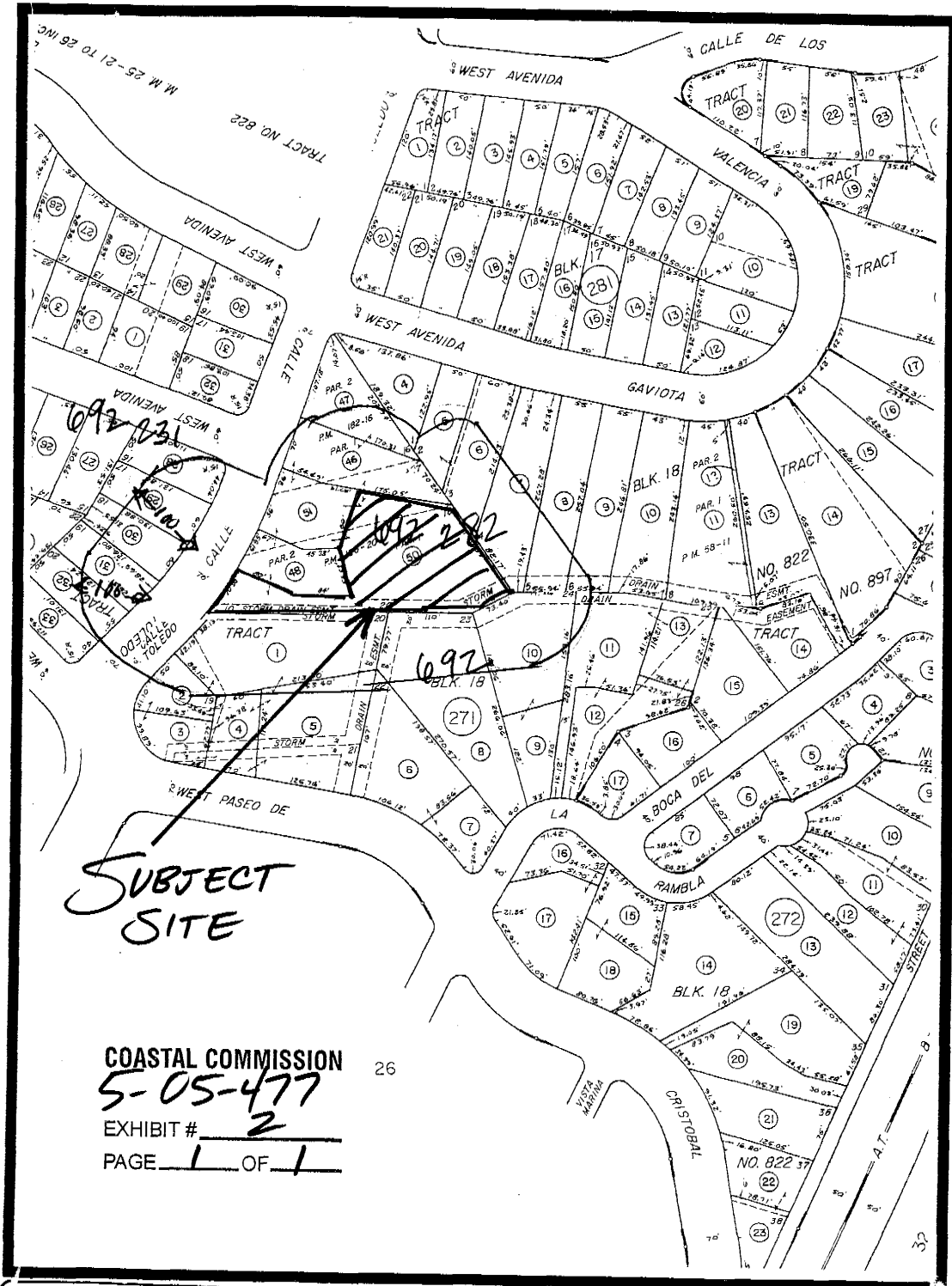
Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental 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 that the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the environmentally sensitive habitat, water quality, and public access policies of the Coastal Act. Mitigation measures, in the form of special conditions, require 1) submittal of a revised site plan; 2) use of construction best management practices (BMPs); 3) submittal of drainage and runoff control plan; 4) informs the applicant that any future change in the density or intensity of use of the site will require a permit amendment or new permit; and 5) a deed restriction recording the requirements of the permit. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect that the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.



SUBJECT SITE

COASTAL COMMISSION  
5-05-477  
EXHIBIT # 1  
PAGE 1 OF 1



SUBJECT  
SITE

COASTAL COMMISSION 26  
5-05-477  
EXHIBIT # 2  
PAGE 1 OF 1

Ownership Map

PREPARED BY: SUSAN W. CASE, INC.  
917 GLENNEYRE ST #7  
LAGUNA BEACH CA 92651  
949 494-6105

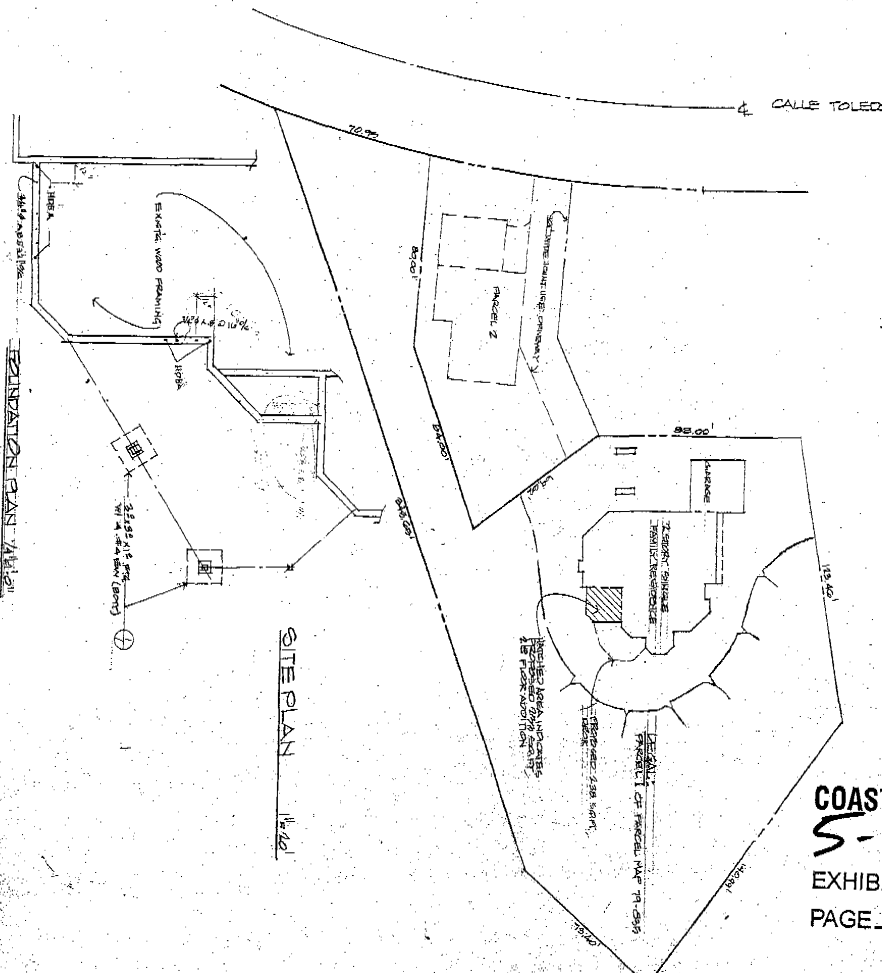
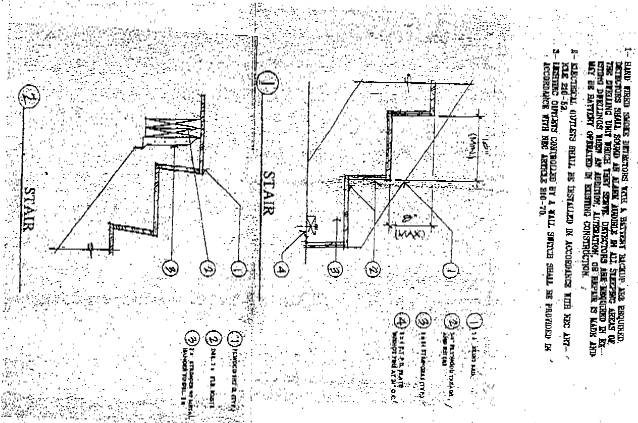
GENERAL REQUIREMENTS

COVER AND FINISHES

1. COVER YIELD SHALL BE DETERMINED BY LABORATORY TESTS AND SHALL BE SUBMITTED TO THE ARCHITECT FOR APPROVAL.
2. ALL COVER YIELDS SHALL BE SUBMITTED TO THE ARCHITECT FOR APPROVAL.
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COASTAL COMMISSION  
5-05-477  
EXHIBIT # 3  
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<p>REVISIONS</p> <p>▲</p> <p>▲</p> <p>▲</p>	<p>DATE DRAWN</p> <p>1-17-07</p>	<p>JOB NO.</p> <p>1-17-07</p>	<p>SHEET NO.</p> <p>2</p>		<p>ARTHUR R. SCHILLER - ARCHITECT INC.</p> <p>34012 STREET OF THE VIOLET LANTERN, DANA POINT, CA 92629-4000</p> <p>HELPER ADDITION</p> <p>1012 CALLE TOLEDO, PT. VILAVE CORDOBA, SAN CLEMENTE, CA.</p>
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**UPPER FLOOR PLAN** (1/4" = 1'-0")  
**LOWER FLOOR PLAN** (1/4" = 1'-0")

**ELEVATION** (1/4" = 1'-0")  
**ELEVATION** (1/4" = 1'-0")  
**ELEVATION A** (1/4" = 1'-0")

WALL	STARTING ELEVATION	STOPPING ELEVATION	THICKNESS	FINISH
1	1st floor slab	4'-4"	12" thick	2-0"
2	1st floor slab	4'-4"	12" thick	2-0"
3	1st floor slab	4'-4"	12" thick	2-0"
4	1st floor slab	4'-4"	12" thick	2-0"
5	1st floor slab	4'-4"	12" thick	2-0"
6	1st floor slab	4'-4"	12" thick	2-0"
7	1st floor slab	4'-4"	12" thick	2-0"
8	1st floor slab	4'-4"	12" thick	2-0"
9	1st floor slab	4'-4"	12" thick	2-0"
10	1st floor slab	4'-4"	12" thick	2-0"
11	1st floor slab	4'-4"	12" thick	2-0"
12	1st floor slab	4'-4"	12" thick	2-0"
13	1st floor slab	4'-4"	12" thick	2-0"
14	1st floor slab	4'-4"	12" thick	2-0"
15	1st floor slab	4'-4"	12" thick	2-0"
16	1st floor slab	4'-4"	12" thick	2-0"
17	1st floor slab	4'-4"	12" thick	2-0"
18	1st floor slab	4'-4"	12" thick	2-0"
19	1st floor slab	4'-4"	12" thick	2-0"
20	1st floor slab	4'-4"	12" thick	2-0"

**REFERENCE NOTES**

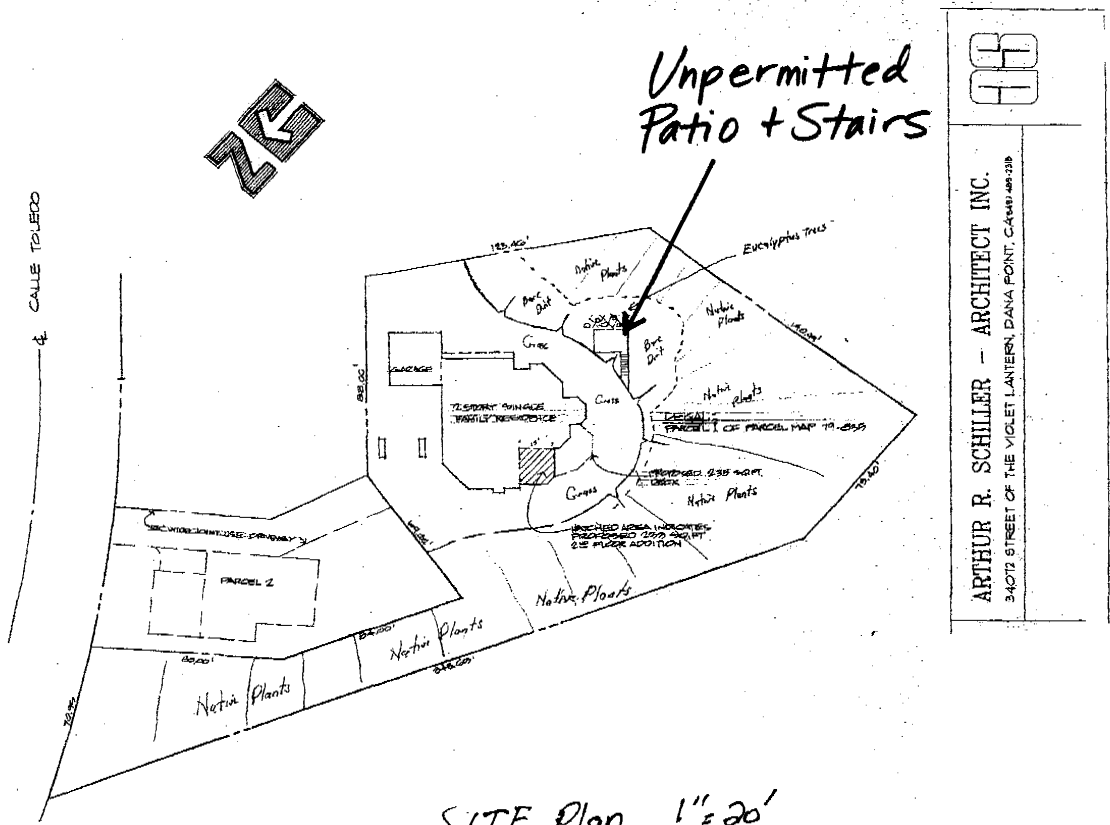
1. Review: Final design walls.
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**COASTAL COMMISSION**  
**5-05-477**  
**EXHIBIT # 3**  
**PAGE 2 OF 2**

**ARTHUR R. SCHILLER - ARCHITECT INC.**  
 34012 STREET OF THE VIOLET LANTERN, DANA POINT, CA 94028-2315  
**HELPER ADDITION**

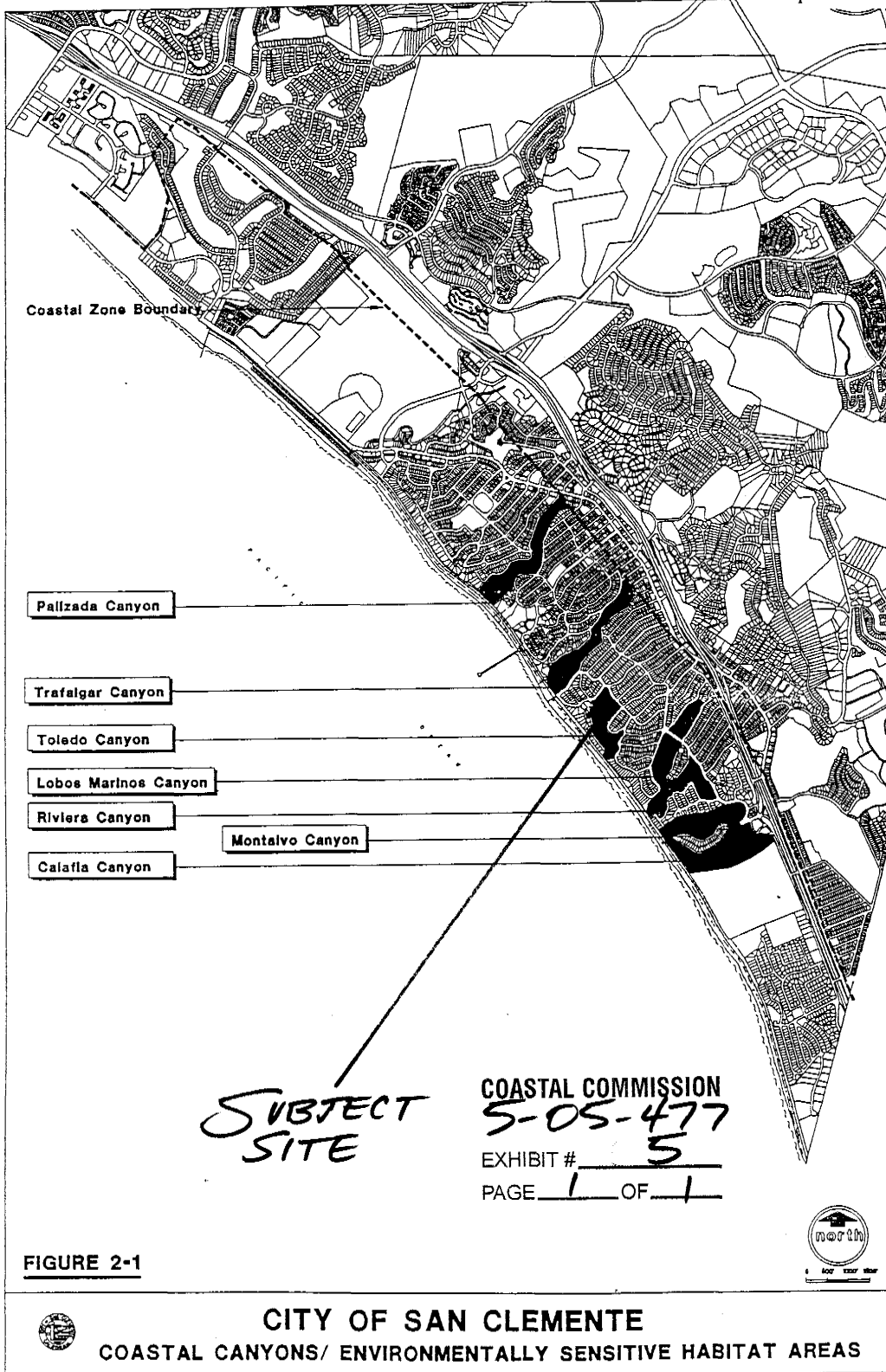
**REVISIONS**

NO.	DATE	DESCRIPTION
1	1-17-08 <td>DATE DRAWN</td>	DATE DRAWN
2		JOB NO.
3		SHEET NO.
4		OF 7



AR  
ARTHUR R. SCHILLER - ARCHITECT INC.  
34072 STREET OF THE VIOLET LANTERN, DANA POINT, CA 92629-4893

SITE Plan 1"=20'  
Vegetation Survey +  
Landscaping Plan





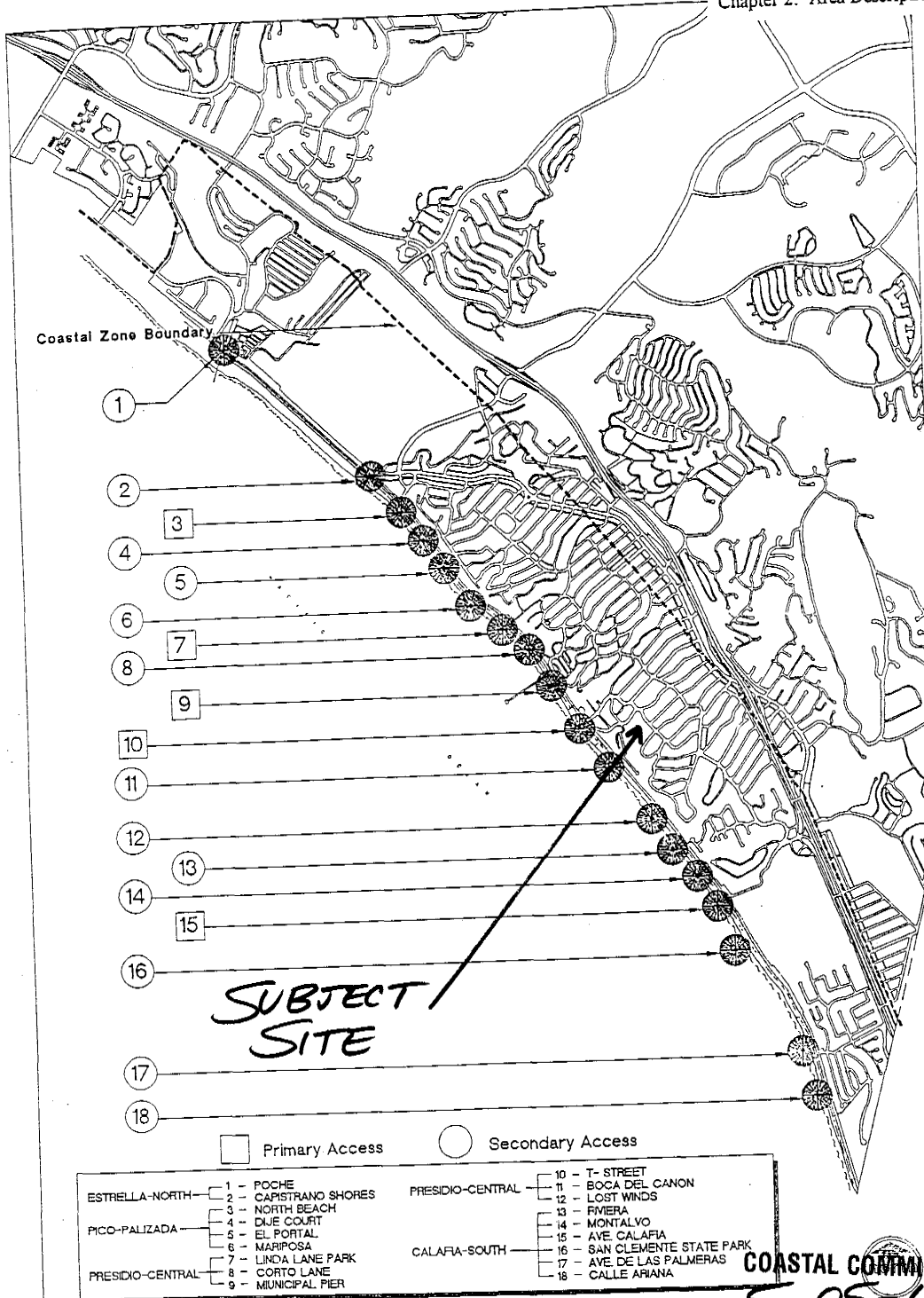


FIGURE 2-5

**CITY OF SAN CLEMENTE  
COASTAL ACCESS POINTS**

**COASTAL COMMISSION**  
5-05-477  
EXHIBIT # 6  
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