CALIFORNIA COASTAL COMMISSION

South Coast District Office 301 E Ocean Blvd., Suite 300 Long Beach, CA 90802-4302 (562) 590-5071



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5-19-0228 (Shorecliffs Senior Housing)

JUNE 11, 2020

EXHIBITS

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Golf Course







Conceptual Northeast Elevations

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Greystar GP II, LLC

SHORECLIFFS SENIOR HOUSING SAN CLEMENTE 501 Avenida Vaquero, San Ciemente , CA 92672

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Exhibit 5 – Dr. Jonna Engel Natural Resources Assessment Memo

MEMORANDUM

- FROM: Jonna D. Engel, Ph.D., Senior Ecologist
- TO: Eric Stevens, District Supervisor
- SUBJECT: Natural Resources Assessment of Proposed Shorecliffs Senior Apartments Site

DATE: May 20, 2020

Documents Reviewed:

- Glenn Lukos Associates. April 15, 2020. Wetland Enhancement and Protection Plan, Coastal Development Permit Application No. 5-19-0228 (501 Avenida Vaquero, San Clemente, Orange County). Addressed to Eric Stevens, California Coastal Commission District Supervisor.
- Glenn Lukos Associates. August 29, 2018 [Updated November 27, 2018] [Updated March 18, 2019]. Results of a Biological Resource Assessment and Surveys for Approximately Nine-Acre Site Located in San Clemente, Orange County, California. Addressed to Omar Rawi, Development Director, Greystar.
- Glenn Lukos Associates. August 28, 2018. Jurisdictional Delineation for the Greystar Senior Apartment Site, an Approximately Nine-Acre Site Located in San Clemente, Orange County, California. Addressed to Omar Rawi, Development Director, Greystar.

I have been asked to evaluate the natural resources on and adjacent to the 9.18 acre proposed Shorecliffs Senior Apartment project site (located at 501 Avenida Vaquero, San Clemente, California) for the presence of environmentally sensitive habitat (ESHA) and wetlands. To do so I have reviewed the documents cited above, site photographs, Google Earth aerials, and conducted California Natural Diversity Database (CNDDB) queries. Most of the property, including all areas where development is proposed, consists of an active golf course driving range, a golf course clubhouse, golf course parking, and areas of golf course turf and ornamental vegetation. The driving range is surrounded by a tall net held in place by large telephone-like poles. A drainage course with associated wetland habitat runs immediately alongside the northwestern most stretch of the driving range (Photographs 1, 2, & 3) and pockets of native vegetation occur in the northwestern corner. The western side of the drainage coincides with the edge of the property. The adjacent property, owned by the Chateau Clemente Homeowners Association (HOA), consists of a steep slope dominated by invasive non-native vegetation including acacia, black mustard, wild radish, pampas grass, and eucalyptus (Photograph 4).

Glenn Lukos Associates (GLA) Senior Biologist Tony Bomkamp and other GLA biologists and regulatory staff visited the site to conduct vegetation mapping, general biological 5-19-0228 (Shorecliffs Senior Housing)

surveys, and a jurisdictional wetland delineation on February 5, October 31, and December 29, 2016. Mr. Bomkamp's "*Results of a Biological Resource Assessment and Surveys for Approximately Nine-Acre Site Located in San Clemente, Orange County, California*" letter memorandum of August 29, 2018 was updated twice; on November 27, 2018 and on March 18, 2019. I talked to Mr. Bomkamp (pers. comm, May 6, 2020) and confirmed that each update involved site visits to verify that the on-the-ground conditions were the same.

GLA conducted CNDDB queries for the San Juan Capistrano and Dana Point Quadrangles, to examine the potential for presence of special status species prior to visiting the property. GLA then conducted direct observations of the entire site to map the land use and vegetation types and to assess the vegetation and other physical features for the potential to support sensitive plants, animals, or communities.

GLA documented a total of 11 land-cover and vegetation types within the 9.18 acre site (Figure 1). By far the largest area of the property is in the developed category which totals 7.21 acres. The native vegetation category accounts for only 0.66 acres and consists of five vegetation types including cattail marsh, alkali meadow, southern willow scrub, coyote bush scrub, and coast goldenbush scrub. The native scrub vegetation occurs along the northwestern perimeter of the property and does not include rare scrub vegetation types. The non-native vegetation types include Sydney golden wattle acacia, ornamental trees, eucalyptus, pampas grass, and ruderal vegetation and accounts for 1.31 acres.

In addition, based on CNDDB queries and habitat assessment, GLA determined that the northwest comer of the site had low potential to support southern tarplant *(Centromadia parryi* ssp. *australis)*, a California Native Plant Society (CNPS) 1B.1 listed, and a global G3T2 and State S2 rarity ranked, species. GLA conducted focused botanical surveys during the October 31, 2016 site visit during the peak blooming period for southern tarplant and did not find any tarplant individuals or any other sensitive plant species. While GLA determined that the site itself does not support habitat for special-status animals, they stated "areas to the north and west of the site contain areas of coastal sage scrub which exhibits potential for supporting the coastal California gnatcatcher". During the general biology surveys, GLA did not observe any sensitive animal species.

Section 30107.5 of the Coastal Act defines environmentally sensitive area or ESHA as¹:

...any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Based on the results of GLA's vegetation mapping, general biological surveys, and focused botanical surveys for southern tarplant, as well as my review of site photographs, Google Earth images, and CNDDB query results, I concur with GLA that the proposed project site and immediate surroundings do not support habitat that is rare or that supports rare plant or animal species or that is especially valuable. Therefore, I find that the site does not support habitat that meets the definition of ESHA.

¹ The Coastal Act definition of ESHA is incorporated verbatim in the certified San Clemente Land Use Plan (LUP) Policy RES-51.

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Mr. Bomkamp, along with several GLA regulatory specialists, conducted wetland sampling and delineated wetland habitat on the project site on February 5 and October 31, 2016. They mapped a drainage course with associated wetlands that runs along a portion of the northwest side of the property immediately adjacent to the golf course driving range. According to GLA:

"The drainage course receives non-storm nuisance runoff and storm runoff from approximately 185 acres of developed watershed, including portions of the I-5 freeway and developed areas across the freeway to the northeast (flows from developed areas are concentrated and discharged into the drainage course via a 54-inch storm drain, a 42-inch storm drain, three 24-inch storm drains and two 18inch storm drains, all of which outlet northwest of the project site). Despite efforts by the Regional Water Quality Control Board and the City to prohibit dry season nuisance runoff, the amount and consistency of nuisance runoff discharging from these storm drains is enough to promote wetlands along this drainage course, both within the project site and upstream of the project site."

Interspersed along the drainage course are swale areas that support freshwater marsh dominated by southern cattail (*Typha domingensi*) as well as areas that contain alkali meadow vegetation dominated by pickleweed (*Salicornia pacifica*), salt grass (*Distichlis spicata*), and non-native Spanish false fleabane (*Pulicaria paludosa*). GLA delineated these areas and determined that the wetlands along the drainage total approximately 0.11 acres within the coastal zone (Figure 2).

Section 30121 of the Coastal Act defines wetlands as²:

"Wetland" means lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens.

The drainage ditch along the northwestern perimeter of the site supports wetlands that meet the Coast Act definition for wetlands. Section 30233 of the Coastal Act limits dredging, filling, and diking to a limited set of allowable uses and only when impacts to the respective wetland is fully mitigated. Any uses that are not allowed must protect wetlands by applying appropriate buffers between development and the wetland. The Coastal Act does not prescribe wetland buffer widths but precedence has been a minimum of 100 feet. Narrower buffers have been permitted when a qualified biologist determines that a smaller width would be sufficiently protective of the biological integrity of the respective wetland and would avoid significant adverse impacts to the wetland given the site-specific characteristics of the resource, and the type and intensity of disturbance.

Currently there is no buffer between the drainage course and associated freshwater marsh and alkali wetland areas and the golf course driving range on the proposed project side and the slope with invasive non-native vegetation on the adjacent HOA property (Photographs 1, 2, 3, & 4). The applicant is proposing to enhance the drainage course and wetland habitat and to provide a 50 to 57 foot buffer onsite and a 30 to 50 foot buffer on the offsite HOA property that will be restored with appropriate native wetland

² The Coastal Act definition for wetlands is incorporated verbatim in the certified San Clemente Land Use Plan (LUP).

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transitional species merging into native upland scrub vegetation and monitored for success for five years and maintained in perpetuity after that. This will be a great ecological improvement to the current conditions where there is a driving range net and turf within the proposed onsite buffer zone and invasive non-native vegetation in the proposed offsite buffer zone. The implementation and ongoing success of the buffer restoration on the HOA-owned side of the wetland is crucial to ensure the biological integrity and preservation of the drainage course and associated wetlands. It is unlikely that the reduced 50 to 57 foot buffer onsite would be sufficiently protective of the drainage course and associated wetland were it not for the proposed restoration of the offsite 30 to 50 foot buffer area. A low intensity type of use, an emergency access road blocked to regular traffic, is the planned development next to the onsite buffer. Given the existing circumstances I find that the proposed buffer widths, in conjunction with the proposed habitat enhancement and buffer zone restoration, along with the low intensity development adjacent to the buffer, is sufficient to ensure the biological integrity and preservation of the drainage course and associated wetlands.

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Photograph 1. Drainage course with driving range onsite (to the right) and slope with invasive non-native species offsite (to the left).

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Photograph 2. Northern portion of drainage course and associated wetlands with driving range onsite (to the right) and slope with invasive non-native species offsite (to the left).

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Photograph 3. View east of drainage course and associated wetlands with driving range onsite (to the left) and slope with invasive non-native species offsite (to the right).

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Photograph 4. Offsite slope on the HOA property and onsite area north of the coastal zone where pampas grass and acacia proposed for removal

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Figure 1. Exhibit 3, Vegetation Map, of GLA's Biological Resource Assessment report. All the native vegetation is found along the northwest perimeter of the property near or adjacent to the drainage course.

Figure 2. Exhibit 6 of GLA Jurisdictional Wetland Delineation report. Light blue color represents the mapped Coastal Commission wetland.