

CALIFORNIA COASTAL COMMISSION

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



W12c

5-20-0432 (Russell Family Trust)

May 12, 2021

EXHIBITS

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Exhibit 1 – Project Site

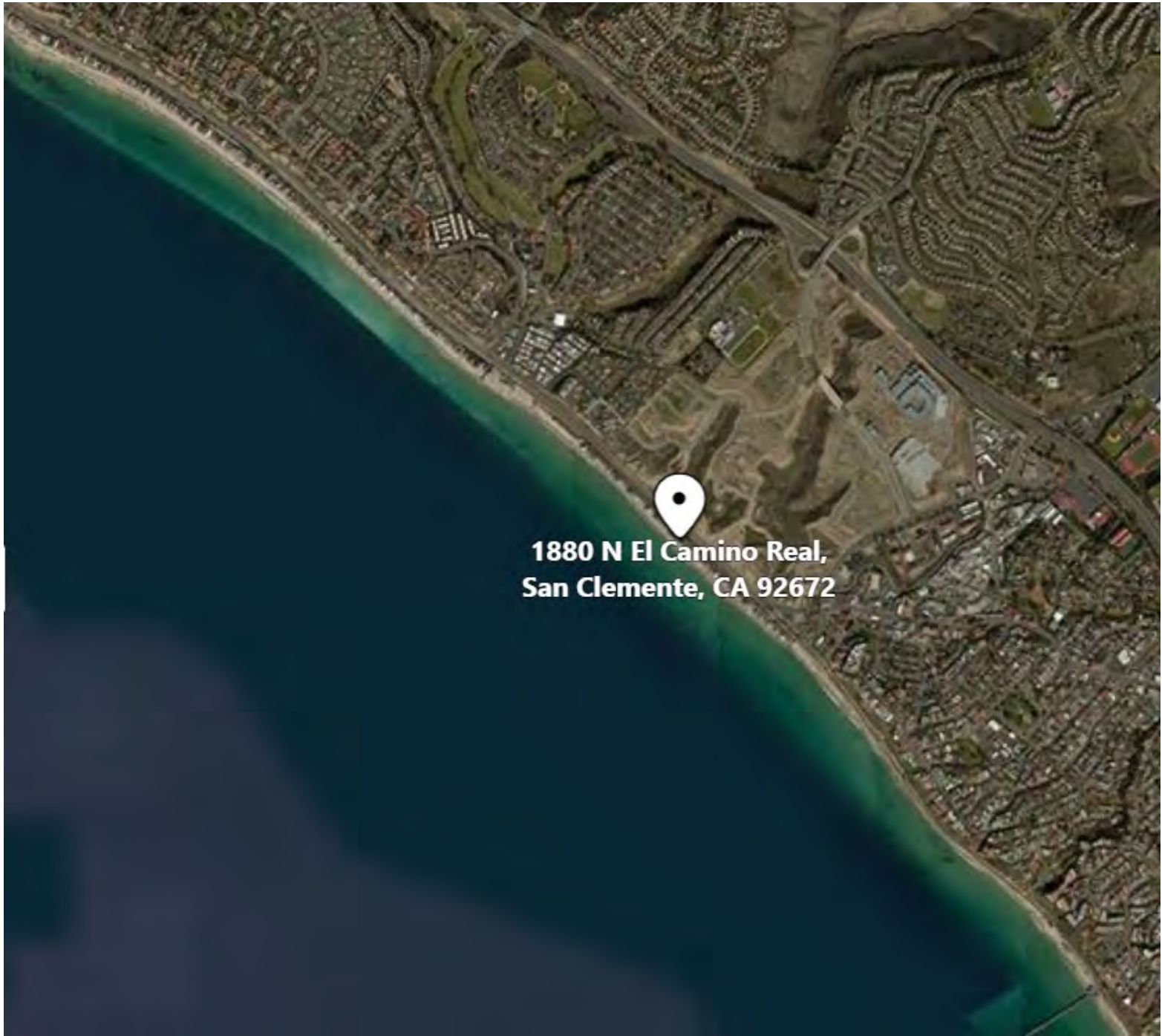
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Exhibit 6 – Letters from the Applicant on Park History and Transportability





California Coastal Commission
CDP No. 5-20-0432
Exhibit 1
Page 2 of 2

Seal / Signature: _____



Structural Engineer
**D.E.J. STRUCTURAL
CONSULTANTS, INC.**
14271 JEFFREY DR.,
SUITE 245
IRVINE, CA 92680
949-497-6810, FAX: 949-497-6819
dejengineering@yahoo.com

Project:
**RUSSELL
RESIDENCE**
1880 N. EL CAMINO REAL
UNIT 54
SAN CLEMENTE
CALIFORNIA

Owner:
CHRIS & HELENE RUSSELL

HCD Approval

Revisions:

No.	Date	Revision
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Date: 7 / 10 / 20

Job No.:

Association

Bldg. Dept. Submittal:

Bid Issue:

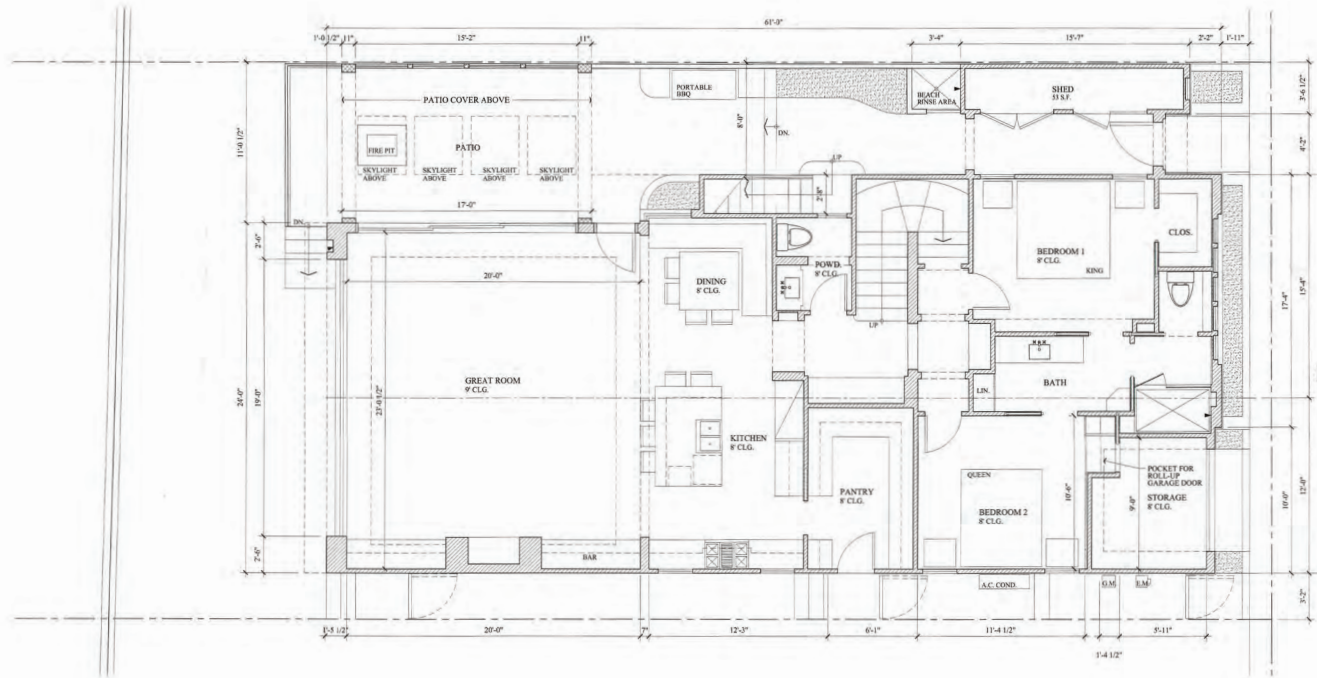
Construction Issue:

Sheet Title:

MAIN LEVEL PLAN
(CHATTEL)

Sheet No.:

A - 2



MAIN LEVEL PLAN
1/4" = 1'-0"



APPROVED

Approval of these plans does not authorize or approve any
extension of revision from requirements of state law or
application for approval. Approval of approved plans and
the duration on the stated date of approval. Plans may
be replaced when they become obsolete or discontinued.

AUG 19 2023

John Rodriguez

State of California
Department of Housing and
Community Development
Division of Codes and Standards

PETERS ASSOCIATES

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949-412-4428
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Seal / Signature:



Structural Engineer

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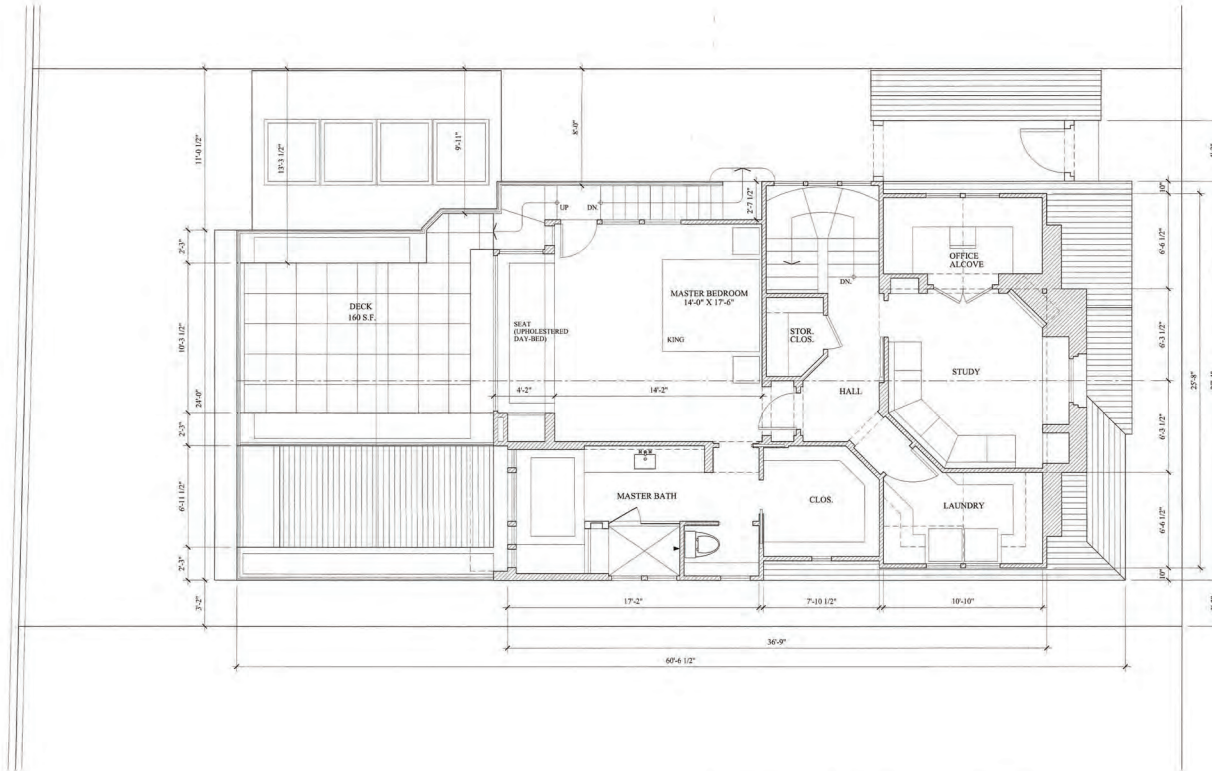
Construction Issue:

Sheet Title:

**UPPER LEVEL PLAN
(CHATTTEL)**

Sheet No.:

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UPPER LEVEL PLAN
1/4" = 1'-0"

PROJECT NORTH
TRUE NORTH

California Coastal Commission
CDP No. 5-20-0432

Exhibit 2
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REVISIONS:
1. 7/10/20 - 1. 1/4" = 1'-0" SCALE
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HCD Approval

Revisions:

[illegible]

Date: 7/10/20

Job No.:

Association Submittal:

Bldg. Dept. Submittal:

of state laws and state and local laws.

Construction Issue:

Sheet Title:

ELEVATIONS

Sheet No.:

A - 4



NORTH ELEVATION



NORTH ELEVATION



ELEVATION KEYNOTES

- | | |
|---|--|
| A | BOARD AND BATTEN SIDING - W/ COMPOSITE PANELS OR FIBER CEMENT PANELS W/ FIBER CEMENT BATTENS |
| B | HORIZONTAL SHIP LAP SIDING - FIBER CEMENT |
| C | STONE VENEER |
| D | MILGARD "ESSENCE" WINDOWS - FIBERGLASS CLAD WOOD WINDOWS |
| E | "TIREX" OR "AZEX" COMPOSITE TRIM AT WINDOWS AND EAVES |
| F | "CLASS A" COMPOSITE ASPHALT SHINGLE ROOFING |
| G | BRACH LIGHT |

Approval of these provisions is a condition of deviation from the applicable local ordinances. They will be available on the project site and be replaced when they become illegible.

AUG - 9 2007

State of California
Department of Housing and Community Development
San Bernardino

WEST ELEVATION (OCEAN)

EAST ELEVATION (STREET)
1/4" = 1'-0"

California Coastal Commission

CDP No. 5-20-0432

Exhibit 2
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View 1 - Existing Condition

No view to proposed project due to existing landscape screening

View 1 - Proposed



View 2 - Existing Condition



View 2 - Proposed



View 3 - Existing Condition



View 3 - Proposed



View 4 - Existing Condition



View 4 - Proposed



View 5 - Existing Condition





Date: December 6, 2020

To: Sherman L. Stacey
Gaines & Stacey LLP
1111 Bayside Drive, #280
Corona del Mar, CA 92625
949-640-8999

Re: Capistrano Shores Space 54 – Russell Residence
Wireframe Buildable Envelope Over Proposed Structure

Dear Mr. Stacey:

Under a previous scope of work, Visual Impact Group LLC prepared exhibits depicting the existing condition and the future appearance of a manufactured home located at Space 54 at Capistrano Shores Mobile Home Park at 1880 Camino del Rey, San Clemente. We were requested to perform additional work, showing the boundaries of the buildable envelope with a 16' ridge height.

VIG created a three-dimensional computer model representing this envelope. We then rendered the model from 4 locations, overlaying it as a wireframe over the model previously created.

We consider the study images to be accurate based upon the drawings provided in the initial scope.

Sincerely,

VISUAL IMPACT GROUP, LLC

By A handwritten signature in blue ink, appearing to read "Brent C. Chase".

Brent C. Chase, Principal

California Coastal Commission

CDP No. 5-20-0432

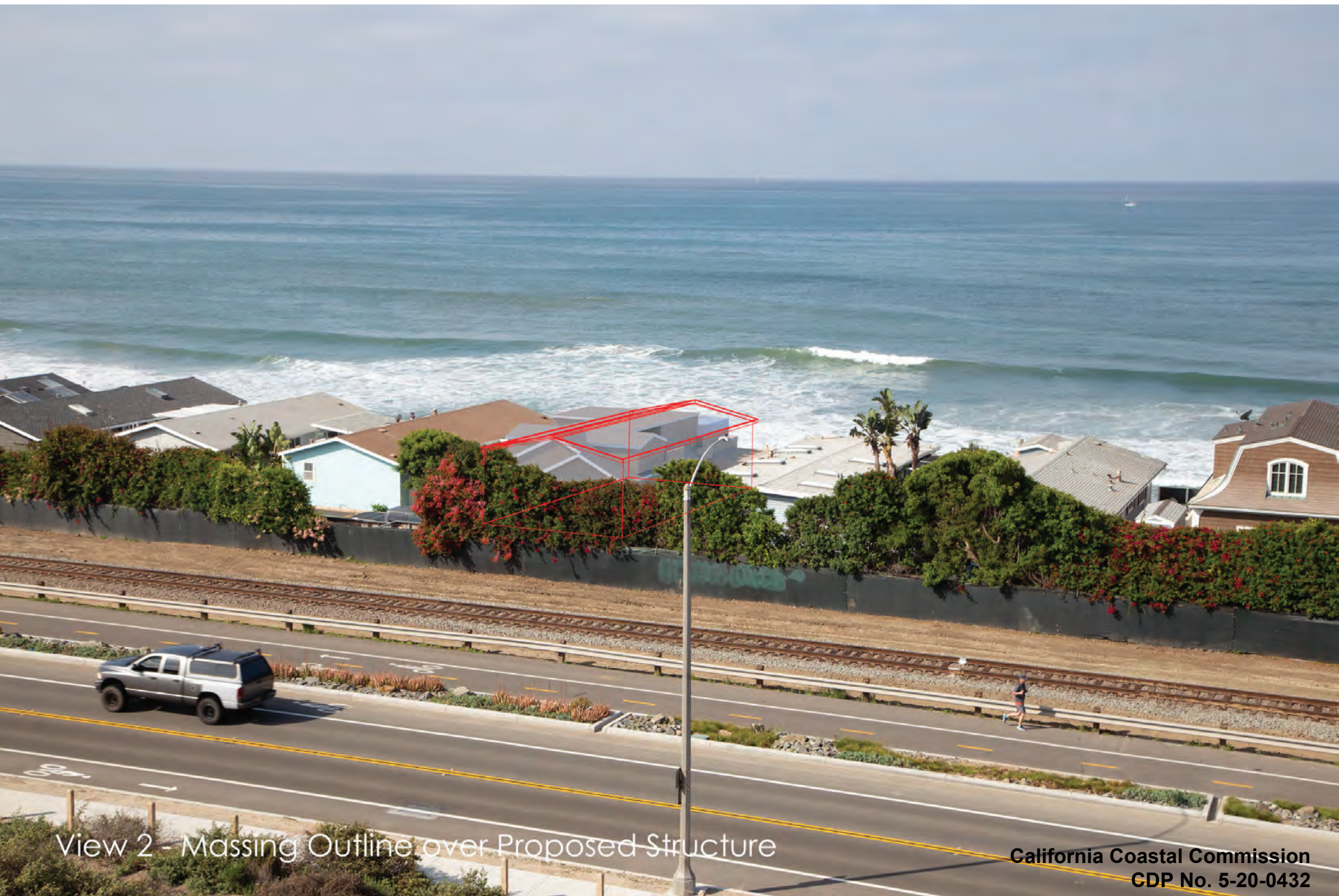
Exhibit 4

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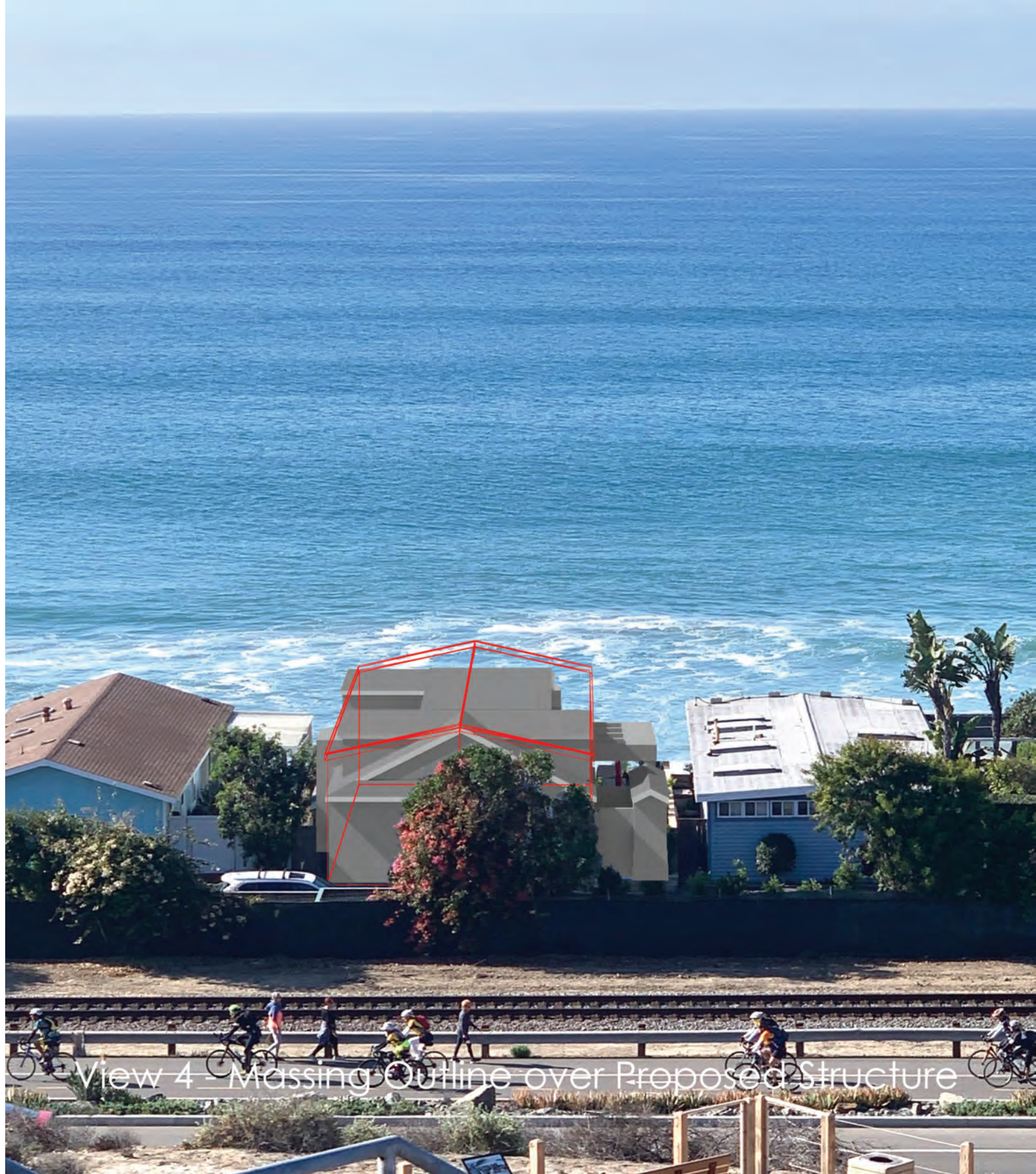
View 1 - Missing Outline over Proposed Structure



View 2 - Massing Outline over Proposed Structure



View 3 - Massing Outline over Proposed Structure



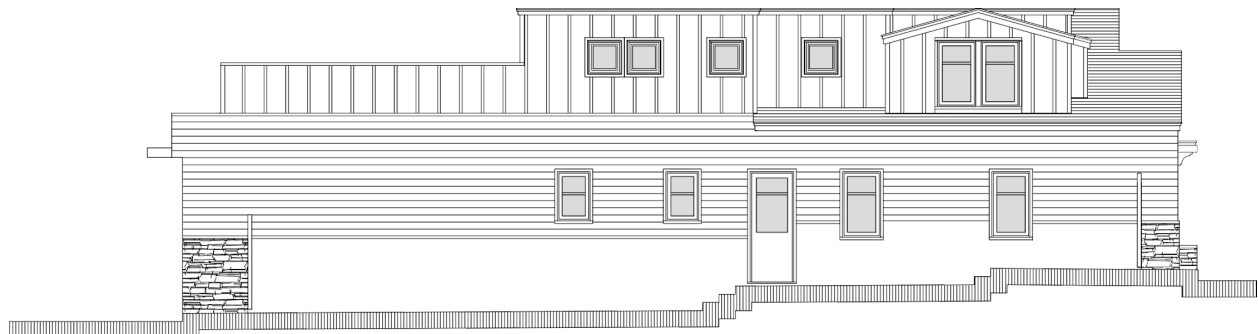
View 4 - Massing Outline over Proposed Structure

Dear Karl,

This correspondence is being sent in support of the application before the Coastal Commission, which concerns Space #54 in Capistrano Shores, San Clemente (CDP 5-20-0432). We are the homeowners Chris and Helene Russell. After the recent Zoom meeting with Christine Pereira of your office, we felt it might be good to reach out to you directly and provide a bit of a written summary of what was conveyed along with the photographs that were passed along. With 6 of us in the meeting, we are not sure it was as cohesive of a presentation as possible, despite Christine's significant attention and focus. Thank you for the opportunity to present our position now in written form as to how our proposed design supports better your good and necessary work in protecting "views to and along the ocean and scenic coastal areas".

After the submission of our plans to your office, On October 28th Christine reached out to Sherman Stacey, our attorney who is assisting us on the application, requesting if my wife and I would be willing to change the proposed roof design to a "pitched roof". Christine indicated the reason for the request was because "...it generally (the pitched roof design) allows for less of a visual impact...". Christine further indicated that such a request was direct guidance from you and your staff. The apparent belief was that a sloped or pitched roof line, with the high point ridge at 16 feet, was considered a better design in order to protect public views. Our design is also capped at 16 feet BUT the highest part of the roofline has a substantial setback on the water side of the structure, as this side drawing of the plans reflect.

Partial Set Back Flat Roof Design



We are new to this process, as this is the first home we have owned anywhere close to the ocean, but we are supporters of protecting our beautiful coastline, as our first, new, granddaughter is a 6th generation Californian. We love California and desire to preserve its beauty for all future generations. In that spirit, our proposed design with the referenced set back (a partial flat roof if you will), allows for less of a "visual impact" than a 16-foot pitched roofline with no set back. The difference being of course is the set back. In fact, our design is all about the set back. In that regard, please review the following 4 photographs where red line graphics have been added to the proposed structure, which layover a 16-foot pitched roof design. Christine indicated you folks hold the belief such a pitched roof design provided better ocean views. However, as the pictures below clearly reflect and the following objective data supports, that belief is misplaced, at least when compared against our design. Each photograph is one full page (and all are attached to the cover email as well) in order to fully view all of the detail.



View 1



View 2



View 3



View 4

The set-back concept is admittedly not an easy concept to describe without viewing photographs. At least that was the case for us when Bill Peters, the architect on the project, first proposed it to us. However, upon reviewing the red lined photographs provided, we hope you will agree that the partial flat roof set back design better meets the goal of improving ocean water views. At the same time, it maintains/enhances the community character (as the discussion further below reflects) and of course provides a bit more living area for our proposed new beach cottage. As an aside, this is our primary home, having moved 3 years ago from the Lake Forest area. With 4 grown daughters who visit often, 1 grandchild and 2 more on the way, our current space is very fairly limited.

In the Zoom meeting with Christine, we confirmed that the 16-foot partial flat roof elevation is pulled back from the waterside edge of the home roughly seventeen feet, as the first image above reflects. This provides an improved view of the ocean from all angles of the hill behind the community when compared to the pitched roof design.

Since the meeting we have made an effort to objectively quantify the actual amount of improvement of the ocean views our design provides. Bill Peters was kind enough to do the calculations for us. The result of Bill's measurements was that the amount of ocean view gained versus lost by our design equated to an approximate 3-1 ocean view gain vs. loss ratio. In each of the four photographs when comparing the single ridge pitched roof (red line design) against our proposed design, our design provides objectively more ocean view. If 100% equals both the total gain and loss of ocean views in each photograph when comparing the 2 designs, view #1 above reflects a **26% loss of ocean view but a 74% ocean view gain**. View #2 reflects a **24% loss of ocean view but a 76% ocean view gain**. View #3 provides a **4% loss of ocean view but a whopping 96% ocean view gain**. View #4 reflects a **43% loss of ocean view but a 57% ocean view gain**. What these numbers reflect is that the partial flat roof set back design is a superior design if we are looking solely at the impact of the view on the hill behind our community.

As I indicated above, I also I wanted to touch on the character of the Capistrano Shores Community since that is something that Christine brought up as well. This is a concern shared by all parties. At the Zoom meeting with us was Eric Anderson, the manager of Capistrano Shores. Eric was present in his capacity as a representative of the HOA that governs the community. The HOA fully supports our design because it provides the detailed setbacks and the additional non-box rooflines on the street side of the home, which drastically breaks up the home so as to not end up with a "box" look. Eric informs me that your office did though approve a partial flat roof design for #6 in our community I believe earlier this year, so our partial flat roof set back design is not a foreign concept, at least as to our community.

Per Eric and my communication with our HOA Board, although older style homes still do exist in the community, we now of course hold ourselves to different standards. The HOA Board and Helene and I all agree that this design is in line with the required attention to architectural detail the community now strives for i.e., a "beach cottage" look. Please see the below image of that beach cottage look, which is front and center of our proposed structure.

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Exhibit 5
Page 6 of 8



Helene and I, along with Bill and in consultation with Eric, have painstakingly gone through the process of sacrificing what we believe to be a highly valuable square footage reduction of viable living space and have greatly decreased our internal home size. We did that in order to better accommodate exterior square footage for the architectural relief you see in the above image and the plans as a whole. While not every owner in the park when “refreshing” their home or putting in a new home will choose our design, per Eric the HOA strives to have more than one alternative which peacefully co-exists with the Commission’s standards for protection of views.

With that final point being said, I believe that addresses the two main issues that we discussed at the meeting. We want to thank you again Karl for allowing us the opportunity to have further dialogue on this project, which though small in the grand scheme of things, is very important to us. We worked hard and put forth what we felt was significant sacrifice and a scaled back footprint in order to work within the confines of a sixteen-foot maximum height. Furthermore, we also pulled back that allowable height by seventeen feet along the ocean side of the home in order to better improve views for the folks walking the trails behind the community. We have further trimmed back the east side/street side of the property by narrowing the interior living space to accommodate varied roof lines and setback the small loft area to further provide “shadows” (Bill’s term) and non-box like architectural aesthetics. As I said, we feel we have worked hard.

Christine advised us that she would be discussing the presentation of this new information to you and others on your staff. We are hopeful that after reviewing the comparative images you will concur that we truly have strived and accomplished to produce a better product than the secondary option of a sixteen-foot, single ridge line, pitched roof structure. Even though we have a bit of a bias, we believe

this design is also a beautiful addition to the community, which at the same time fits within the allowable height and profile.

That being said, Helene and I and/or Sherman Stacey or Eric Anderson would be more than happy to make ourselves available to discuss this matter further if you should have any concerns or feel there are any discrepancies between this correspondence and what you are seeing when reviewing this project. We do feel our design is in the best interests of those members of the public who utilize the hill behind our community, in addition to our Capistrano Shores community and of course the Russell family. We are hoping that you and your team agree.

Thank you.

Chris Russell
Helene St Pierre Russell

Christopher and Helene Russell



FRED GAINES
SHERMAN L. STACEY
LISA A. WEINBERG
REBECCA A. THOMPSON
NANCI S. STACEY
KIMBERLY RIBLE
ALICIA B. BARTLEY

LAW OFFICES OF
GAINES & STACEY LLP
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(949)640-8999
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March 11, 2021

BY EMAIL

Christine Pereira
California Coastal Commission
301 East Ocean Blvd., #300
Long Beach, CA 90802

RE CDP No. 5-20-0432 (Russell)
1880 N. El Camino Real, Space 54, San Clemente

Dear Christine:

At the hearing on February 10, 2021, three Commissioners requested that CDP No. 5-20-0432 (Russell) be removed from the Consent Calendar. Executive Director Ainsworth stated that this would come back to the Commission with the same recommendation. I am writing to you to provide further support for Ainsworth's statement and additional information regarding the transportability of mobilehomes at Capistrano Shores, both as to the laws which apply and as to the practical application of those laws in actual transport of the structures.

1. Since 2017, the Commission has Consistently Approved New and Rehabilitated Mobile Homes under Consistent Special Conditions and Consistent Findings of Fact.

The Commission has made the same decision for 10 other mobile homes in the Park since 2017 making substantially similar findings. The prior decisions are as follows:

1. #6 CDP 5-19-1093
2. #12 CDP 5-14-1582
3. #22 CDP 5-16-0265
4. #32 CDP 5-19-1179
5. #36 CDP 5-16-0265
6. #67 CDP 5-18-0325
7. #68 CDP 5-18-0326
8. #80 CDP 5-09-179-A2
9. #81 CDP 5-09-180-A1
10. #90 CDP 5-10-180

California Coastal Commission
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Exhibit 6
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The Commission has approved each of these permits based upon conditions which were worked out after a Judgment against the Commission in *Capistrano Shores Property LLC v. California Coastal Commission*, Orange County Superior Court Case No. 30-2015-00785032-CU-WM-CJC. In that case the Commission had imposed conditions waiving the coach owner's right to improved protection for their home. The Court ruled that the Commission had no authority under Sections 30235 or 30253 to even impose that Special Condition, much less deny a CDP which is what Surfrider urges you to do now.

The Commission further acknowledges that any development of the revetment would have to be applied for separately by the park owner, not by this applicant. (Id.) In relation to any such (future) application and decision, the Commission seems to fully retain the power to prevent any seaward expansion of the revetment, considering the Coastal Act's policies and goals. The record does not defeat a scenario where the revetment could be expanded inward, in a way that may not endanger the public coastal resources, for example [See Opp. Brief at 9:3 "Because the Commission does not have such an application in front of it for the seawall, the Commission does not know what specific impacts it could have of what alternatives may exist"). Therefore, it appears unreasonable to require a waiver from this applicant, of this magnitude ("any rights"). The special conditions does not seem reasonably, closely, substantially tied to the specific project at hand (replacing one mobile home inside the park). *Surfside Colony, Ltd. v. California Coastal Com.* (1991) 226 CalApp.3d 1260, 1267-1268 noted there should be a substantial "connection" or "nexus" or "substantial relationship" between the public burden created by the proposed new construction and the conditions required by the Commission under federal constitutional standards enunciated in *Nollan v. California Coastal Commission* (1987) 483 U.S. 1 825, 107 S.Ct. 3141.

The Commission has scrupulously followed this decision since it was issued by the Court as noted in the 10 CDP decisions which I have cited above. If even a condition requiring waiver of future protection was beyond the jurisdiction of the Commission, it is not conceivable that denial of a CDP can be justified. A denial of a CDP is a far more intrusive loss of rights than the waiver which the Court found that the Coastal Act did not authorize.

In 2012, the owner of the Park, Capistrano Shores, Inc. ("CSI"), submitted an application seeking CDP No. 5-12-069 which would allow them to do continuous maintenance on the seawall as opposed to doing a specific maintenance project. The objective of the Park's application was to have a CDP which would allow the Park to do maintenance, not expansion, whenever it was necessary without the necessity to seek a separate CDP each time maintenance may be needed. The Notice of Incomplete Application and discussions with the Coastal Staff led CSI to the belief that a blanket maintenance CDP was very unlikely to be issued. Therefore, CSI

did not complete the CDP application, choosing instead to seek a CDP when a specific maintenance or improvement project might be contemplated. As yet, this need has not arisen.

CSI has considered CDP Application No. 5-12-069 to be no longer relevant. Usually, the Commission Staff would have returned an incomplete application long before now. It would seem appropriate that CSI should withdraw this application as it has served no purpose for a considerable time. I will provide a withdrawal under Calif. Code of Regs., Title 14, § 13071 but a separate written communication.

2. Nothing that Surfrider Presented Contained New Information Not Known to the Commission.

Surfrider presented video of waves breaking on the Capistrano Shores seawall. This is nothing new. This has taken place during various seasons at peak high tides for the past several decades. The video may appear to show the Park and its coaches in danger. But neither the Park nor the coaches are in danger from the sea. Detailed engineering reports on the seawall protection are provided with every CDP Application and include analysis based upon the latest Commission guidance on sea level rise. These reports have concluded that for the useful life of the mobile homes, the existing seawall will provide adequate protection from high tide and surf events.

3. Surfrider's Claim that Mobile Homes at Capistrano Shores are Not Mobile is False.

With no evidence presented to support its assertion, Surfrider also claimed that the mobile homes at Capistrano Shores are not truly mobile. There are substantial and material differences between a mobile home constructed or altered under Federal and State regulations to assure mobility and a home built on a separate lot under the California Building Code. Among these material differences are the requirement that a mobile home, whether newly manufactured or altered, is transportable. Under Section 4 of this letter, I reference HCD regulations governing "transportation". (Calif. Code of Regs., Title 25, §4070, Part 280, § 280.902.) Under these regulations, both new, old and altered mobile homes are easily moved.

I have attached a letter from William Smith of Sequoia Home Funding LLC is a mobile home dealer licensed in California by HCD. Mr. Smith is familiar with the actual transportation, placement, removal and replacement of mobile homes. Mr. Smith describes that a mobile home is made ready for removal from a mobile home park within 3 days of the time the work to remove the mobile home begins. The removal and relocation is done at a reasonable cost to the owner. But the material fact is that due to special requirements for design, a mobile home is easily both placed and removed, and withstands the rigors of transport without significant impact to its structure.

1. **Day 1:** Remove personal property (furniture, kitchen loose items, clothes, etc.) Appliances and large, heavy furniture does not have to be moved out. Disconnect utilities and remove fence if applicable.
2. **Day 2:** Prepare mobilehome for moving, e.g., remove skirting, awnings, stairs, porches, disconnect piers (this is the “foundation”) etc. (“accessory structures”) and commence separating sections. HCD Permit not required.
3. **Day 3:** Complete separation of sections and remove piers; load mobilehome onto transport and remove from the Park. HCD Permit not required; Permit under vehicle code required if transporting over public streets.

As the Commission has noted in prior decisions, new mobile homes purchased from manufacturers are often 16 feet high at the ridgeline. This height does not detract from the mobility of the mobile home. Similarly, the alterations of the Russell mobile home reach 16 feet in height, but will still be separable between the two halves and fully mobile in accordance with HCD regulations more fully described below. HCD has licensed mobile homes that are fully two stories in height. In such circumstances, the mobile home is separated into 4 parts, two sides and two floors. Each of the 4 parts is designed to be independently transported. This is not an issue for the Russell application as transport at 16 feet is normal. Transport routes, times, speeds and safety requirements are all regulated under the California Vehicle Code. Permitting for transport are issued by Caltrans (see, <https://dot.ca.gov/programs/traffic-operations/transportation-permits/tp-manual>), or local governments regarding streets or highways under their jurisdiction. (See, Vehicle Code §§ 35780, *et seq.*)

4. Laws Applicable to Mobile Homes.

The structural design of mobile homes is established under the National Manufactured Housing Construction and Safety Act of 1974, 42 U.S.C. §§ 5401, *et seq.* California has implemented the Federal Law in the adoption of the Manufactured Housing Act of 1980, California Health and Safety Code §§ 18000 *et seq.* (“MHA”). The MHA provides California with an independent basis to facilitate compliance with, and enforcement of, the Federal Building Codes for mobile homes. The State definitions of mobile homes incorporates the Federal definitions. (See, Health & Safety Code § 18000, § 18007.

The State and Federal building codes for the mobile homes applies in mobilehome parks or manufactured housing communities, and outside of those parks or communities, to provide a safe and affordable housing opportunity for Californians. All aspects of the distribution, sale, installation, repair, and remodel of the mobilehome structures are controlled by the Federal Statutes and State statutes.

California’s codes for the construction and for the rehabilitation of mobile homes were adopted by the California Department of Housing and Community Development under the authority of the MHA. These regulations are found at Calif. Code of Regs., Title 25, § 4070. Section 4070 adopts Part 280 establishing a code for “Mobile Home Construction and Safety

Standards” (the “MHA Code”). The MHA Code applies whether a mobilehome is constructed in a factory or an existing mobilehome is altered or rehabilitated on site. Calif. Code of Regs., Title 25, § 4050(b). In order to maintain its status as a mobile home, a mobile home must be “transportable”. See, Part 280, § 280.2(a)(16).

“(16) ‘Mobile Home’ means a structure, transportable in one or more sections, which is eight body feet or more in width and is thirty-two body feet or more in length, and which is built on a permanent chassis, and designed to be used as a dwelling with or without permanent foundation, when connected to the requirement utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained therein.”

Transportation is covered in Subpart J of Part 280, §§ 280.901, *et seq.* The purposes of the transportation regulations for construction are set forth in § 280.902:

“(a) The cumulative effect of highway transportation shock and vibration upon a mobile home structure may result in incremental degradation of its designed performance in terms of providing a safe healthy, and durable dwelling. Therefore, the mobile home shall be designed, in terms of its structural, plumbing mechanical and electrical systems, to fully withstand such transportation forces during its intended life. (See 280.303(c) and 280.305(a))

“(b) Particular attention shall be given to maintaining watertight integrity and conserving energy by assuring that structural components in the roof and walls (and their interferences with vents, windows, doors, etc.) are capable of resisting highway shock and vibration forces during primary and subsequent secondary transportation moves.”

When altering an existing mobile home, the same standard with regard to transportation engineering is applied in the plan check by HCD. It is the existence of these regulations and the administration by HCD that assures that the mobility that is described by Mr. Smith and in Section 3 of this letter is assured.

I hope that all of this information is of use to you in describing why the mobile homes at Capistrano Shores (and other locations) are mobile and easily relocated. Even the high tides and waves depicted by Surfrider are rare and last for a short period of time. Expert reports, not graphic display or unsupported assertion, are the evidence that establishes that the Russell project will not be subjected to unnecessary hazards. Redevelopment protected by pre-Coastal shoreline protection is not limited by the Coastal Act.

I refer you as well to the Malibu Local Coastal Program which was drafted by the Coastal Commission staff and certified by the Coastal Commission. The Malibu LCP authorizes the

Christine Pereira
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continual redevelopment of property with new and remodeled homes behind seawalls that predominate the Malibu coastline. If the Coastal Act allows homes in the Malibu Colony to be redeveloped behind its seawall, then mobile homes at Capistrano Shores should be treated no differently.

Sincerely,

Sherman L. Stacey

SHERMAN L. STACEY

SLS/sh

cc: Mr. & Mrs. Chris Russell
Eric Anderson



3/16/2021

Christine Pereira
California Coastal Commission
301 East Ocean Blvd., #300
Long Beach, CA 90802

RE: CDP No. 5-20-0432 (Russell)
1880 N. El Camino Real, Space 54, San Clemente

Dear Christine:

Sequoia Home Replacement, LLC is a mobile home dealer licensed in California by HCD (Housing Community Development). We are currently contracted for the replacement of several homes within the Capistrano Shores community. Our firm specializes in the placement and removal of factory-built housing in unique environments such as sites after fire disasters where slope and grading issues are impaired and in environmentally sensitive areas such as Capistrano Shores. We are qualified to rebut that portion of the Surfrider's letter headlined **Mobile Misnomer**.

Manufactured or mobile homes in the United States are designed, engineered, and constructed under the HUD Code, the only federal building code. That code defines manufactured housing as being mobile and able to be towed to the building site on a chassis and transported on axels and wheels and later capable of being relocated by again being transported on axels and wheels. Both HUD and HCD enforce that code and dealers and HCD licensed contractors are bound by that code.

A manufactured home is installed on a foundation system at the delivery site. The owner chooses on-site enhancements to increase livability and esthetics. The home remains on its factory installed chassis to which axels, wheels and the towing tongue can be reattached for removal and relocation. Nothing done by the owner after delivery and installation changes the portability of the home. Regardless of whether the owner of the mobile home desires additional alterations once the unit is delivered, the applicable codes require that the same portability of the homes be preserved.

The following is a general timeline for removal and relocation of a mobilehome:

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1. **Day 1:** Remove personal property (furniture, kitchen loose items, clothes, etc.) Appliances and large, heavy furniture does not have to be moved out. Disconnect utilities and if a fence, remove.
2. **Day 2:** Prepare mobilehome for moving, e.g., remove skirting, awnings, stairs, porches, disconnect piers (this is the “foundation”) etc. (“accessory structures”) and commence separating sections. HCD Permit not required.
3. **Day 3:** Complete separation of sections and remove piers; load mobilehome onto transport and remove from the Park. HCD Permit not required; Permit under vehicle code required if transporting over public streets.
4. **Day 4:** Relocation Site: Set up mobilehome, on piers, etc. HCD Permit required with inspection for Certificate of Occupancy.
5. **Days 5:** While waiting on HCD and if applicable, install fence, set up storage shed, landscaping.

**The cost to perform the work in the above timelines ranges from \$12,500.00 to \$26,000.00 depending upon size, accessory structures, and other factors. The pricing does not include space fencing, storage sheds, landscaping, etc.*

The owner cannot commence placing personal property back into mobilehome until HCD inspection and Certificate of Occupancy is issued. This can roughly be expected within one to ten days, depending upon how busy HCD is at the time and the location of the replacement Park. Excluding any CCC permit, there are only two (2) permits required: HCD which generally can be obtained in a couple of days, note however, that after the mobilehome is setup, an inspection by HCD is required for compliance with the Title 25 and a Certificate of Occupancy issued (generally issued onsite after the inspection) and the Vehicle Code permit for transporting on public roads.

As a footnote, we believe that the Commission and environmental groups like Surfrider Foundation should be reminded of the minimal environmental impact of mobile homes compared to traditional stick- built units. Factory-built homes utilize less raw materials and do not risk site contamination as do residential units built on site. While this is indirectly related to Surfrider’s objection and the commission’s inquiry it does support the contention that one participant in the conflict shares the desire to achieve minimal environmental impact by the activity at hand.

Kind regards,

William Smith

William Smith
Owner

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