



## CITY OF NEWPORT BEACH ZONING ADMINISTRATOR STAFF REPORT

December 11, 2025  
Agenda Item No. 3

**SUBJECT:** The Place Temporary Outdoor Patio (PA2025-0139)  
▪ Limited Term Permit

**SITE LOCATION:** 2920 East Coast Highway

**APPLICANT:** Katie Flamson, The Place

**OWNER:** John Klohs

**PLANNER:** Melinda Whelan, Assistant Planner  
949-644-3221, [mwhelan@newportbeachca.gov](mailto:mwhelan@newportbeachca.gov)

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### **LAND USE AND ZONING**

- **General Plan Land Use Plan Category:** Corridor Commercial (CC)
- **Zoning District:** Commercial Corridor (CC)

### **PROJECT SUMMARY**

A request for a limited term permit to allow an approximately 500 square foot temporary outdoor dining area for up to a one year term. The outdoor dining area was previously authorized through a Limited Term Permit (PA2023-0230). No permanent construction is proposed.

### **RECOMMENDATION**

- 1) Conduct a public hearing;
- 2) Find this project exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15301 under Class 1 (Existing Facilities) of the CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, because it has no potential to have a significant effect on the environment; and
- 3) Adopt Draft Zoning Administrator Resolution No. \_ approving Limited Term Permit filed as PA2025-0139 (Attachment No. ZA 1).

## **DISCUSSION**

- An application was filed by Katie Flamson with respect to property located at 2920 East Coast Highway for a Limited Term Permit to allow a 500-square-foot temporary outdoor dining area (i.e., patio) to serve The Place restaurant for up to one year.
- A 500-square-foot temporary outdoor dining patio with two canopies at 160 square feet each was originally authorized on May 25, 2023, by the Zoning Administrator through a Limited Term Permit (PA2022-119). The Limited Term Permit expired on December 31, 2023. A second Limited Term Permit (PA2023-0230) for the same design was approved by the Zoning Administrator on January 16, 2025, and expired July 16, 2025.
- The applicant met with staff to discuss the preparation of a conditional use permit to maintain the patio on a permanent basis. Staff advised the applicant that the Corona del Mar Study (CdM Study) currently in process could result in code changes that allow the subject patio to remain on a permanent basis. For example, the CdM Study could result in streamlined review of use permits and/or changes to the parking requirements for restaurants and outdoor dining patios. Therefore, on August 27, 2025, the Applicant applied for a Limited Term Permit to authorize the outdoor patio for one additional year while the CdM Study and associated Zoning Code Amendments are processed. At the end of the one-year period, the Applicant would be required to obtain a Conditional Use Permit for the use and/or comply with the new procedures and requirements of the Zoning Code.
- The patio proposal will remain the same size (500 square feet) as authorized by the prior Limited Term Permit (PA2023-0230). Two canopies at 160 square feet each will cover the patio. A site plan showing the size and location of the patio is available as Attachment No. ZA 3.
- The outdoor dining area will temporarily occupy two of the four existing on-site parking spaces. One standard parking space and one accessible parking space will remain available for patron parking.
- The Place has operated in this location since 1984 and has a current Type 47 (On-Sale General Eating Place) Alcoholic Beverage Control (ABC) license. Food service use on the site was authorized in 1988 through Use Permit No. 3058. The hours of operation for the restaurant are 9:00 a.m. to 12:00 a.m., daily. The patio is conditioned to operate until 9:00 p.m., daily.
- To date, no complaints have been received by the City regarding the operation of the business and the temporary outdoor dining patio.

## **ENVIRONMENTAL REVIEW**

This project is exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15301 under Class 1 (Existing Facilities) of the CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3 because it has no potential to have a significant effect on the environment.

The Class 1 exemption includes the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use. The project authorizes a temporary, 500-square-foot outdoor dining area within the parking lot of an existing restaurant and is within the parameters of the Class 1 exemption and will not have a significant effect on the environment. There are no known exceptions listed in CEQA Guidelines Section 15300.2 that would invalidate the use of these exemptions.

## **PUBLIC NOTICE**

Notice of this application was published in the Daily Pilot, mailed to all owners of property within 300 feet of the boundaries of the site (excluding intervening rights-of-way and waterways), including the applicant, and posted on the subject property at least 10 days before the scheduled hearing, consistent with the provisions of the Municipal Code. Additionally, the item appeared on the agenda for this meeting, which was posted at City Hall and on the City website.

## **APPEAL PERIOD:**

An appeal or call for review may be filed with the Director of Community Development within 14 days following the date of the action. For additional information on filing an appeal, contact the Planning Division at 949-644-3200.

Prepared by:

  
Melinda Whelan  
Assistant Planner

LAW/msw

Attachments:	ZA 1	Draft Resolution
	ZA 2	Vicinity Map
	ZA 3	Project Plans

# **Attachment No. ZA 1**

Draft Resolution

## **RESOLUTION NO. ZA2025-###**

### **A RESOLUTION OF THE ZONING ADMINISTRATOR OF THE CITY OF NEWPORT BEACH, CALIFORNIA, APPROVING A LIMITED TERM PERMIT FOR A TEMPORARY OUTDOOR DINING AREA LOCATED AT 2920 EAST COAST HIGHWAY (PA2025-0139)**

THE ZONING ADMINISTRATOR OF THE CITY OF NEWPORT BEACH HEREBY FINDS AS FOLLOWS:

#### **SECTION 1. STATEMENT OF FACTS.**

1. An application was filed by Katie Flamson, concerning property located at 2920 East Coast Highway, and legally described as Lot 2, Block O, Tract 323 in the City of Newport Beach, Orange County, California requesting approval of a Limited Term Permit.
2. The applicant proposes a limited term permit to allow a maximum 500-square-foot temporary outdoor dining area for up to a one-year term. The existing temporary outdoor dining area was previously authorized through a Limited Term Permit (PA2023-0230).
3. The subject property is designated CC (Corridor Commercial) by the General Plan Land Use Element and is located within the CC (Commercial Corridor) Zoning District.
4. The subject property is not located within the coastal zone.
5. A public hearing was held on December 11, 2025, online via Zoom. A notice of the time, place, and purpose of the hearing was given in accordance with the Newport Beach Municipal Code (NBMC). Evidence, both written and oral, was presented to and considered by, the Zoning Administrator at this hearing.

#### **SECTION 2. CALIFORNIA ENVIRONMENTAL QUALITY ACT DETERMINATION.**

1. This Project is categorically exempt pursuant to Title 14 of the California Code of Regulations pursuant to Section 15301, Division 6, Chapter 3, Guidelines for Implementation of the California Environmental Quality Act (CEQA) under Class 1 (Existing Facilities) and Section 15303 because it has no potential to have a significant effect on the environment.
2. The Class 1 exemption includes the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of an existing or former use. The project authorizes a temporary 500-square-foot outdoor dining area within the parking lot of an existing restaurant and qualifies under the parameters of the Class 1 exemption.

3. The exceptions to the categorical exemptions under Section 15300.2 are not applicable. The project location does not impact an environmental resource of hazardous or critical concern, does not result in cumulative impacts, does not have a significant effect on the environment due to unusual circumstances, does not damage scenic resources within a state scenic highway, is not a hazardous waste site, and is not identified as a historical resource.

### SECTION 3. REQUIRED FINDINGS.

#### ***Limited Term Permit***

In accordance with Section 20.52.040(G) (Limited Term Permits – Findings and Decision) of the Newport Beach Municipal Code (NBMC), the findings and facts in support of such findings are set forth as follows:

#### Finding:

- A. *The operation of the limited duration use at the location proposed and within the time period specified would not be detrimental to the harmonious and orderly growth of the City, nor endanger, jeopardize, or otherwise constitute a hazard to the public convenience, health, interest, safety, or general welfare of persons residing or working in the neighborhood of the requested limited duration use.*

#### Facts in Support of Finding:

1. The Limited Term Permit will allow a temporary outdoor dining area within the rear parking lot of The Place restaurant. The restaurant was authorized in 1983 through Use Permit No. 3058 (as amended). The temporary outdoor dining area was originally authorized pursuant to a Limited Term Permit (PA2022-119). The Limited Term Permit expired on December 31, 2023. A second Limited Term Permit (PA2023-0230) was approved by the Zoning Administrator on January 16, 2025, and expired on July 16, 2025. On August 27, 2025, the Applicant applied for another Limited Term Permit (PA2025-0139) to retain the temporary outdoor dining patio for one additional year.
2. The temporary outdoor dining area would serve as additional outdoor seating for patrons and is fully located on private property. A temporary barrier is installed within the parking lot to both separate the outdoor dining area from the parking lot and alley and to delineate the area dedicated for outdoor dining and alcohol service. There are no existing City utilities within the expanded dining area.
3. The existing hours of operation for the restaurant are 9:00 a.m. to 12:00 a.m., daily. The temporary outdoor dining area is conditioned to close by 9:00 p.m., daily.
4. The Public Works Department, Building Division, and Fire Department have reviewed the project and provided appropriate conditions of approval to ensure the temporary outdoor dining area does not become a hazard to the public.

5. Condition of Approval No. 1 requires all conditions of approval of Use Permit No. 3058 be adhered to, unless otherwise modified by the conditions of approval contained herein. No amplified sound or live entertainment shall be permitted within the temporary outdoor dining area.
6. The permitted use shall adhere to applicable State of California and Orange County Health Care Agency guidelines for the safe operation of the use. It is the responsibility of the permittee to implement and follow industry-specific guidance of the State of California and the Orange County Health Care Agency guidelines, as required by Condition of Approval No. 12.
7. The permitted use must be operated in compliance with applicable State Department of Alcoholic Beverage Control (ABC) requirements, as required by Condition of Approval No. 14.
8. The proposed operation is conditioned to be accessible to all persons, including those with disabilities, in accordance with the Americans with Disabilities Act (ADA), as required by Condition of Approval No. 21.
9. The Newport Beach Police Department (NBPd) has reviewed the request and is not opposed to the outdoor dining area application.

Finding:

*B. The subject lot is adequate in size and shape to accommodate the limited duration use without material detriment to the use and enjoyment of other properties located adjacent to and in the vicinity of the lot;*

Facts in Support of Finding:

1. The subject lot is approximately 0.08 acres in size and is adjacent to East Coast Highway. Based on the site plan, there is adequate area to accommodate the temporary outdoor dining area without impacting vehicular or pedestrian circulation. The temporary outdoor dining area would be a maximum of 500 square feet.
2. The lot frontage is on East Coast Highway and the use is within a shared building with other commercial uses. The existing food service use has existed at this site since the early 1980s. The expanded outdoor dining area will be located at the rear of the building and will not impede use and enjoyment of the properties in the area.
3. The proposed outdoor area will occupy two of four onsite parking spaces. One accessible stall and one standard stall will be maintained on site.
4. Given the outdoor dining area is located entirely on private property, impacts to pedestrian circulation are not anticipated.

5. No traffic or site circulation issues were experienced during the previous operation of the temporary outdoor dining area and therefore, are not anticipated with this approval.

Finding:

- C. The subject lot is adequately served by streets or highways having sufficient width and improvements to accommodate the kind and quantity of traffic that the limited duration use would or could reasonably be expected to generate.*

Fact in Support of Finding:

1. The subject site has direct access to East Coast Highway and an alley connecting to Third Avenue. The temporary outdoor dining area is located within the private parking lot abutting the restaurant and will not impede access. Parking for the property will remain accessible from the alley.

Finding:

- D. Adequate temporary parking to accommodate vehicular traffic to be generated by the limited duration use would be available either on-site or at alternate locations acceptable to the Zoning Administrator; and*

Facts in Support of Finding:

1. The temporary outdoor dining area will occupy two of the existing four parking spaces with appropriate delineation and temporary substantial physical barricades, which will not encroach into the drive-aisles. One accessible parking space and one standard parking space will be maintained for the restaurant's use for the duration of the Limited Term Permit. Removal of the two existing parking spaces would be temporary.
2. The proposed outdoor dining patio is small, at 500 square feet, and is not expected to result in a significant parking demand beyond the existing restaurant's parking demand. The commercial corridor of Corona del Mar provides public on-street parking along East Coast Highway. Additionally, The Place historically serves the surrounding neighborhood with a higher volume of bike and pedestrian traffic.
3. Fact 1 in Support of Finding C incorporated by reference.

Finding:

- E. The limited duration use is consistent with all applicable provisions of the General Plan, any applicable specific plan, the Municipal Code, and other City regulations.*

Facts in Support of Finding:



1. The General Plan land use category for this site is CC (Corridor Commercial). The CC designation is intended to provide a range of neighborhood-serving retail and service uses along street frontages that are located and designed to foster pedestrian activity. Permitted uses include those permitted in the CC Zoning designation, which includes restaurants by obtaining a use permit. The expanded outdoor dining use is accessory to the existing restaurant, will be utilized for a limited duration on-site, and will be in furtherance of the intention for this land use category.
2. The site is in the Commercial Corridor (CC) Zoning District. The CC Zoning District is intended to provide for areas appropriate for a range of neighborhood-serving retail and service uses along street frontages that are located and designed to foster pedestrian activity. The expanded outdoor dining use is accessory to the existing restaurant, will be utilized for a limited duration on-site, and will not impede use of the site consistent with the CC designation. The CC District also allows temporary uses as specified within the Zoning Code and the proposed limited duration use is consistent with this designation.
3. The Limited Term Permit for temporary outdoor dining would complement and be consistent with the other commercial uses permitted within the CC Zoning District in that it provides amenities that support visitors to the area and provides a social gathering place for those who live and work in the neighborhood, consistent with General Plan Land Use Element Goal LU 2, below. Additional benefits from the proposed amendment include providing opportunities for the continuation of local businesses that generate sales tax and provide opportunities for employment, which is consistent with General Plan Land Use Element Policy LU 2.4 (Economic Development):

**Goal LU 2** *A living, active, and diverse environment that complements all lifestyles and enhances neighborhoods, without compromising the valued resources that make Newport Beach unique. It contains a diversity of uses that support the needs of residents, sustain and enhance the economy, provide job opportunities, serve visitors that enjoy the City's diverse recreational amenities, and protect its important environmental setting, resources, and quality of life.*

**Policy LU 2.4 Economic Development** *Accommodate uses that maintain or enhance Newport Beach's fiscal health and account for market demands, while maintaining and improving the quality of life for current and future residents (Imp 1.1, 24.1).*

4. Council Policy D-9 recognizes the need to balance economic development objectives with protection of the environment and the health and safety of the community. The policy recognizes the need to provide effective and efficient structures for implementing economic programs, utilizing staffing to provide healthy, thriving businesses, and maintain a healthy economy while preserving the unique commercial villages in Newport Beach. The proposed Limited Term Permit would support local business and economic prosperity while maintaining the unique character of the Corona del Mar community.
5. The Property is not located within a specific plan area.

6. The Corona del Mar Study (CdM Study) currently in process could result in code changes that allow the subject patio to remain on a permanent basis. For example, the CdM Study could result in streamlined review of use permits and/or changes to the parking requirements for restaurants and outdoor dining patios. Therefore, on August 27, 2025, the Applicant applied for a Limited Term Permit to authorize the outdoor patio for one additional year while the CdM Study and associated Zoning Code Amendments are processed. At the end of the one-year period, the Applicant would be required to obtain a Conditional Use Permit for the use and/or comply with the new procedures and requirements of the Zoning Code.

#### SECTION 4. DECISION.

#### **NOW, THEREFORE, BE IT RESOLVED:**

1. The Zoning Administrator of the City of Newport Beach hereby finds this project is categorically exempt from the California Environmental Quality Act under Section 15301 under Class 1 (Existing Facilities) of the CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3 because it has no potential to have a significant effect on the environment.
2. The Zoning Administrator of the City of Newport Beach hereby approves Limited Term Permit filed as PA2025-0139 subject to the conditions outlined in Exhibit A, which is attached hereto and incorporated by reference.
3. This action shall become final and effective 14 days following the date this Resolution was adopted unless within such time an appeal or a call for review is filed with the Community Development Director by the provisions of Title 20 Planning and Zoning, of the Newport Beach Municipal Code.

**PASSED, APPROVED, AND ADOPTED THIS 11<sup>TH</sup> DAY OF DECEMBER, 2025.**

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Benjamin M. Zdeba, AICP, Zoning Administrator

**EXHIBIT “A”****CONDITIONS OF APPROVAL****Planning Division**

1. *All conditions of approval from Use Permit No. 3058 shall be adhered to unless specifically modified by the following set of conditions.*
2. The temporary outdoor dining area shall be in substantial conformance with the approved site plan stamped and dated with the date of this approval, except as modified by applicable conditions of approval.
3. *The approval of this Limited Term Permit shall be effective from the effective date of this approval until December 26, 2026. The applicant shall be required to cease all permitted operations and remove any temporary improvements made to the outdoor spaces as part of this Limited Term Permit on or before December 26, 2026.*
4. *Approval of this Limited Term Permit does not constitute approval of the temporary outdoor dining patio on a permanent basis. If the applicant wishes to establish a permanent outdoor dining area, then the applicant shall apply for the appropriate permit and be prepared to make improvements or changes to the outdoor dining area, if said permit is approved.*
5. *The outdoor dining area shall not exceed 500 square feet and shall occupy no more than two on-site parking spaces. One accessible parking space and one standard space shall be maintained clear and accessible for use at all times.*
6. *The existing allowed hours of operation of the establishment shall not be extended. The hours of operation of the temporary outdoor dining area as part of this approval shall not extend beyond 9:00 p.m., daily.*
7. *There shall be no use of amplified sound or live entertainment in the temporary outdoor dining area.*
8. The project is subject to all applicable City ordinances, policies, and standards, unless specifically waived or modified by the conditions of approval.
9. The Applicant shall provide adequate trash receptacles within the outdoor dining area and the operator shall provide for periodic and appropriate removal of trash, litter, debris and graffiti from the premises and on all abutting sidewalks within 20 feet of the premises.
10. The Applicant shall ensure that the trash receptacles are maintained to control odors. This may include the provision of either fully self-contained dumpsters or periodic steam cleaning of the dumpsters, if deemed necessary by the Planning Division. Cleaning and maintenance of trash dumpsters shall be done in compliance with the provisions

of Title 14, including all future amendments (including Water Quality related requirements).

11. *The applicant shall install and maintain a physical barrier between any area used and adjacent common pedestrian walkways in accordance with the requirements of the State Department of Alcoholic Beverage Control (ABC).*
12. The Applicant shall adhere to all applicable State of California and Orange County Health Care Agency guidelines for the safe operation of the outdoor dining area.
13. The Applicant shall comply with all federal, state, and local laws, and all conditions of the Alcoholic Beverage License. Material violation of any of those laws or conditions in connection with the use may be cause for revocation of the Limited Term Permit.
14. The Applicant shall obtain and maintain authorization from the State Department of Alcoholic Beverage Control (ABC) for all areas where the sale, service or consumption of alcohol is under the control of the applicant. The establishment shall abide by all applicable regulations of the State Department of Alcoholic Beverage Control.
15. The sale of alcohol “to go” to patrons that dine within the temporary outdoor dining area shall be prohibited.
16. The Applicant shall be responsible for the control of noise generated by the subject facility including, but not limited to, noise generated by patrons, food service operations, and mechanical equipment. All noise generated by the proposed use shall comply with the provisions of NBMC Chapter 10.26 (Community Noise Control) and other applicable noise control requirements of the NBMC.
17. This Limited Term Permit may be modified or revoked by the Zoning Administrator if determined that the proposed uses or conditions under which it is being operated or maintained is detrimental to the public health, welfare or materially injurious to property or improvements in the vicinity or if the property is operated or maintained so as to constitute a public nuisance.
18. The Community Development Director or designee may inspect the modified area at any time during normal business hours.
19. Any change in operational characteristics, expansion in area, or other modification to the approved plans, shall require an amendment to this Limited Term Permit.
20. To the fullest extent permitted by law, Applicant shall indemnify, defend and hold harmless the City, its City Council, its boards and commissions, officials, officers, employees, and agents from and against any and all claims, demands, obligations, damages, actions, causes of action, suits, losses, judgments, fines, penalties, liabilities, costs and expenses (including without limitation, attorney’s fees, disbursements and

court costs) of every kind and nature whatsoever which may arise from or in any manner relate (directly or indirectly) to City's approval of this **Limited Term Permit (PA2025-0139) for The Place Temporary Outdoor Patio**. This indemnification shall include, but not be limited to, damages awarded against the City, if any, costs of suit, attorneys' fees, and other expenses incurred in connection with such claim, action, causes of action, suit or proceeding whether incurred by Applicant, City, and/or the parties initiating or bringing such proceeding. The Applicant shall indemnify the City for all of City's costs, attorneys' fees, and damages which City incurs in enforcing the indemnification provisions set forth in this condition. The Applicant shall pay to the City upon demand any amount owed to the City pursuant to the indemnification requirements prescribed in this condition.

### **Building Department**

21. Any areas used for temporary commercial or institutional use shall be accessible to disabled persons.
  - a. A minimum 4-ft wide accessible path to all functional areas shall be provided.
  - b. Access to restrooms shall be provided at all times.
  - c. Accessible parking stalls shall not be used for seating areas when onsite parking is provided.
  - d. At least one accessible seating area shall be provided.
  - e. Detectable warnings are required when pedestrian paths cross or are adjacent to a vehicular way where no physical barrier is provided to separate the two.
  - f. All exiting paths shall be a minimum 48 inches free and clear. All public walks and sidewalks shall be a minimum 48 inches free and clear.
22. Provide not less than 5% accessible seating at tables and counters with knee clearance of at least 27-inches-high, 30-inches-wide, and 19-inches-deep.
23. The tops of dining surfaces and work surfaces shall be 28 inches to 34 inches above the finish floor.
24. All exiting paths shall be a minimum 48 inches free and clear. All public walks and sidewalks shall be a minimum 48 inches free and clear.
25. All building exits shall remain free and clear of any obstacles that would impede exiting from a building or suite and accessing the nearest public right-of-way.
26. Accessible routes, including under canopy(ies) and other overhead improvements shall maintain a minimum clear height of 80 inches.
27. All electrical distribution lines shall be in good working order and shall be protected from pedestrian and vehicular traffic and shall accommodate accessibility.

**Fire Department**

28. Heaters or other heat emitting devices shall not be used under any flammable or combustible material.
29. Tents shall meet all requirements of Chapter 31 of the California Fire Code. All documents shall be available for inspection.
30. One 2-A: 10BC fire extinguisher shall be mounted and in a conspicuous, readily accessible location.
31. Two exits shall be provided for any area with an occupant load exceeding 49.
32. All fire department appurtenances shall remain accessible with 3 feet of clearance in all directions.

**Public Works Department**

33. *A substantial barricade (k-rail, water-filled barrier or other barrier, approved by the Public Works Department) shall be provided between the proposed outdoor dining area within the parking spaces and the alley. This barrier shall also be provided between the outdoor dining area and any parking drive aisles and parking stalls. Efforts shall be made by the operator to provide an alternative design to the bare, exposed substantial barrier to soften the look and improve the aesthetic to the neighborhood while still meeting the minimum substantial barricade requirements. The operator shall provide the conceptual ideas to the Planning Division for review and approval by Planning and Public Works.*
34. *The dining area and substantial barricades shall not encroach into the existing drive aisle or alley right of way.*
35. There shall be a minimum of 5 feet of space around all overhead facilities, such as poles, and 15 feet of space around all underground facilities, such as vault lids, manholes, vent pipes, pad-mounted transformers, etc.
36. Seating or structures below overhead conductors and/or under the 'drip line' shall be prohibited.
37. Public eating/dining at tables shall not be situated on top of energized vault lids, energized underground structures, or next to vent pipes, etc.

## **Attachment No. ZA 2**

Vicinity Map

# VICINITY MAP



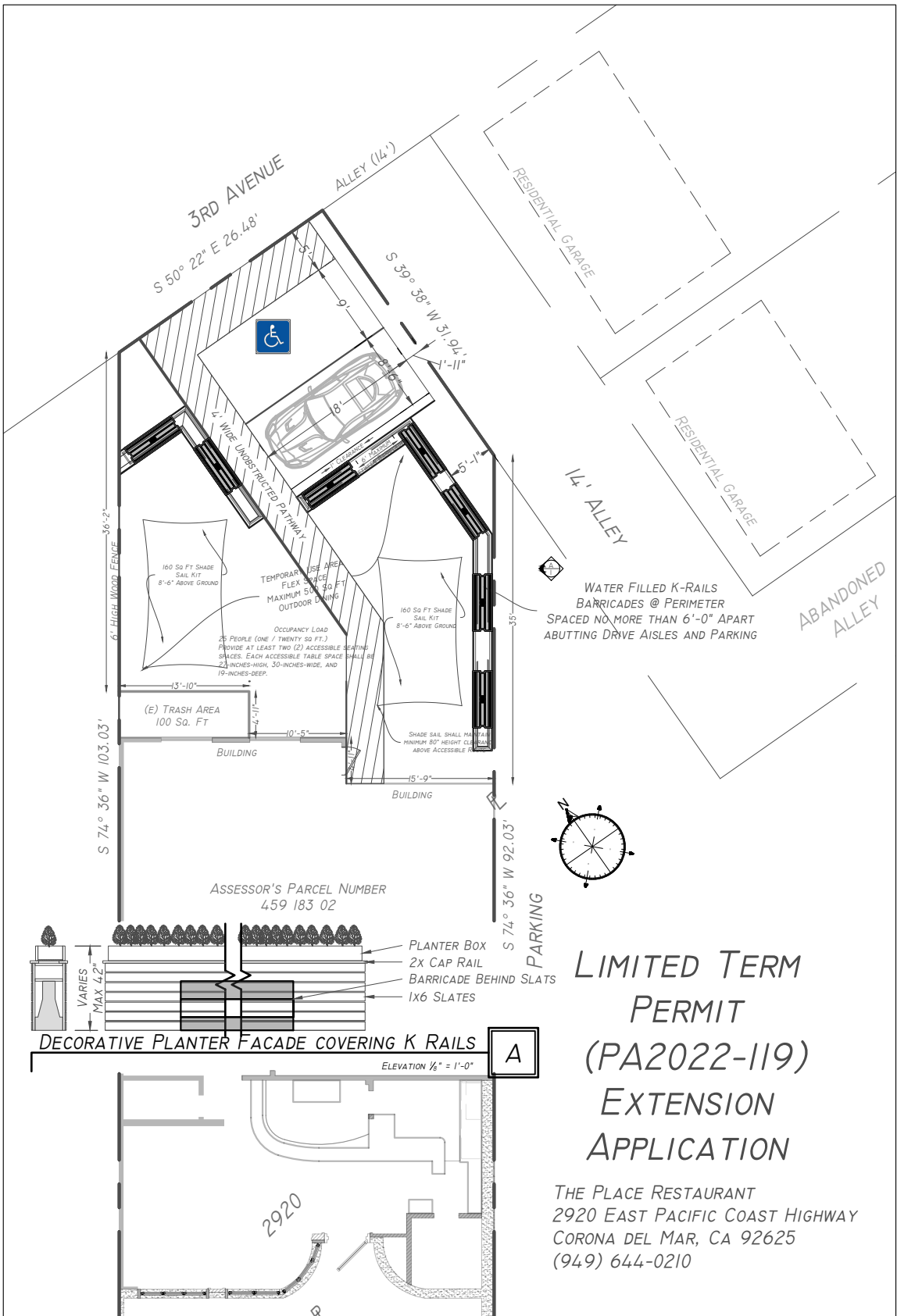
Limited Term Permit  
PA2025-0139

**2920 East Coast Highway**



# **Attachment No. ZA 3**

Project Plans



LIMITED TERM  
PERMIT  
(PA2022-119)  
EXTENSION  
APPLICATION

THE PLACE RESTAURANT  
2920 EAST PACIFIC COAST HIGHWAY  
CORONA DEL MAR, CA 92625  
(949) 644-0210

SCALE 1/16" = 1'-0"