

## CALIFORNIA COASTAL COMMISSION

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January 22, 1996

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TO: COMMISSIONERS AND INTERESTED PERSONS

FROM: CHARLES DAMM, SOUTH COAST DISTRICT DIRECTOR  
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ELLEN LIRLEY, COASTAL PLANNER, SAN DIEGO AREA OFFICE

SUBJECT: CITY OF CORONADO LOCAL COASTAL PROGRAM AMENDMENT NO. 1-95 (Hotel/  
Motel Parking)(For Public Hearing and Possible Final Action at the  
Meeting of February 7-9, 1996)

SYNOPSISSUMMARY OF AMENDMENT REQUEST

This submittal consists of amendments to both the certified land use plan and implementing ordinances addressing parking for hotels and motels in the City of Coronado. The land use plan amendment would adopt uniform parking standards for both uses; currently, motels require more parking than hotels. The implementation plan amendment would incorporate new definitions for hotels and motels, bringing the two into conformity.

The Coronado City Council has passed Resolution No. 7405 modifying LCP Land Use Plan Action Goals "18I" and "18J" and LCP Implementation Ordinance Sub-sections 86.58.030 "I" and "J," 86.04.360 and 86.04.505 to address the proposed changes. This action finalized the local public hearing process.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending denial of the proposed revisions to the City of Coronado's LCP, as submitted, then approval with suggested modifications clarifying that the reduced standards may be applied to refurbishment and minor modifications of existing motels, but not to increases in the number of motel units or to new motel construction. The appropriate resolutions and motions may be found beginning on Page 4. Suggested Modifications are on Pages 6 through 8. The findings for denial, as submitted, of the Land Use Plan begin on Page 8. Findings for approval of the Land Use Plan, with suggested modifications, begin on Page 12. Findings for denial, as submitted, of the Implementation Plan begin on Page 13, and findings for approval of the Implementation Plan with suggested modifications begin on Page 15.

BACKGROUND

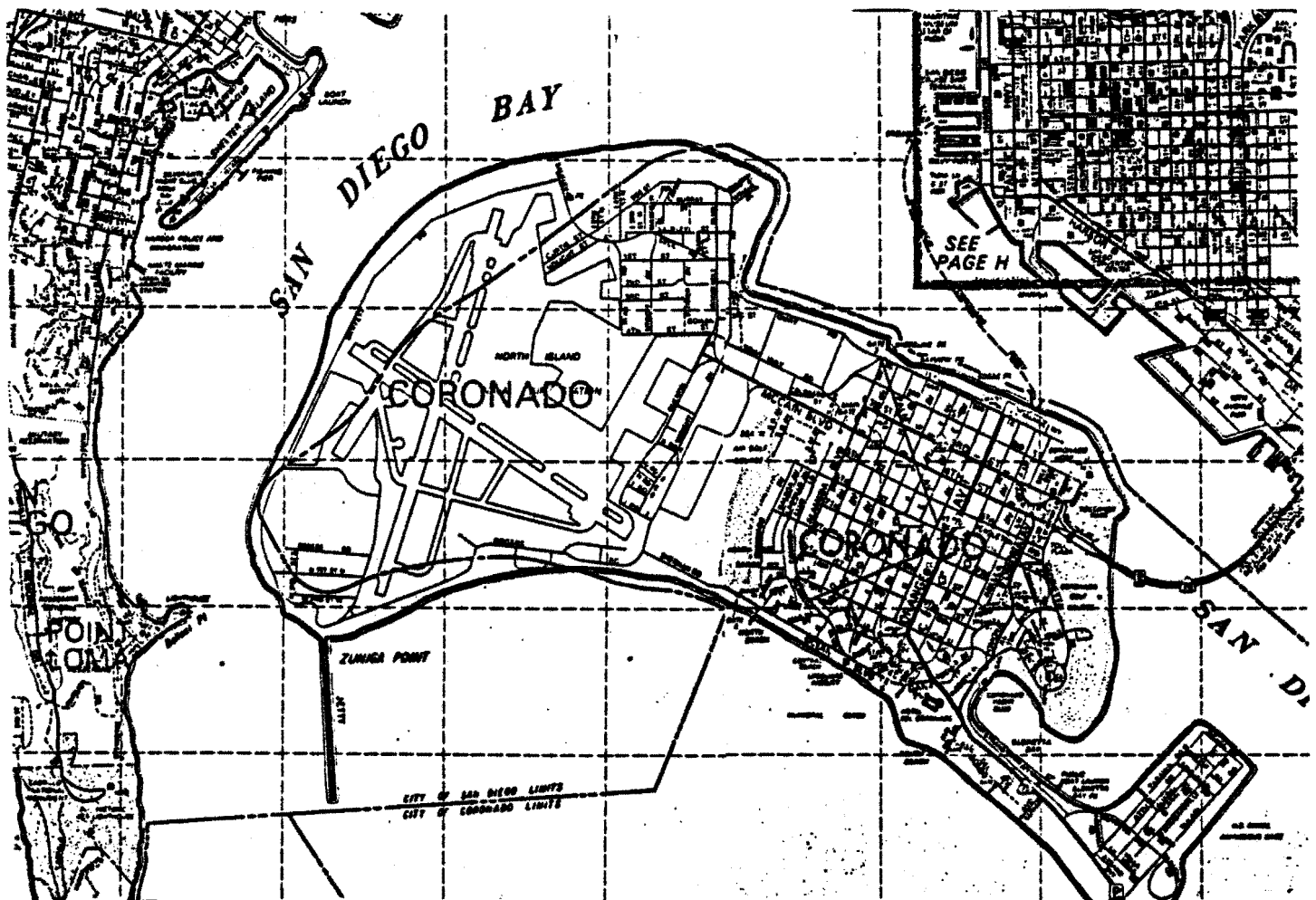
On June 23, 1981, the City of Coronado's Land Use Plan (LUP) was deemed effectively certified, following the incorporation of suggested modifications

from the Coastal Commission's March 13, 1981 action. The Implementation Plan was certified with suggested modifications on September 28, 1983. The ordinances were amended and the City assumed permit authority on January 11, 1984. The Land Use Plan has been amended on several occasions and there have been three previous amendments to the implementing ordinances.

#### ADDITIONAL INFORMATION

Further information on the City of Coronado LCP Amendment 1-95 may be obtained from Ellen Lirley at the San Diego Area Office of the Coastal Commission, 3111 Camino del Rio North, Suite 200, San Diego, CA, 92108, (619) 521-8036.

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## PART I. BACKGROUND

A. LCP History. On June 23, 1981, the City of Coronado's Land Use Plan was deemed effectively certified, following the incorporation of modifications suggested in the Coastal Commission's March 13, 1981 action. Those modifications applied to the Shoreline Access, Recreation and Visitor-Serving Facilities, Visual Resources and Special Communities, Public Works and Locating and Planning New Development components of the City's Land Use Plan. The Implementation Plan was certified with suggested modifications on September 28, 1983. The suggested modifications addressed exemptions from coastal permit requirements, definitions of several terms, procedures for recordation of documents, minor corrections to the Coastal Permit Ordinance and the removal of the Tidelands Overlay Zone from the ordinance package, as this area is under San Diego Unified Port District control, rather than being under the City of Coronado's authority. The ordinances were amended and the City assumed permit authority on January 11, 1984. The Land Use Plan has been amended on several occasions, and there have been three previous amendments to the implementing ordinances.

B. Geographic Area Description. Although often referred to as an island, Coronado is actually connected to the mainland by the Silver Strand, a narrow strip containing beaches and wetland areas, with a highway running down its center. The City of Coronado's jurisdiction extends from the Imperial Beach border at the southern end of the Silver Strand Highway to the northern end of the peninsula. Much of the land is under Federal control, as there are several Naval installations located within Coronado's political boundaries. Also, much of the shoreline and adjacent water areas are under San Diego Unified Port District authority. The entire peninsula is within the coastal zone, but the City's certified LCP has exempted a lot of routine development from coastal development permit requirements.

The City is divided into two geographic areas - the "Village" at the northern end of the peninsula, which includes the bulk of the residential, commercial and municipal improvements, and the "Cays" which are located about halfway along the Silver Strand, on the San Diego Bay side of the peninsula. The "Cays" is a major subdivision, mostly residential with some commercial uses on Port District lands, which was approved on filled tidelands several years before the Coastal Commission came into being. The development that had already occurred, including land divisions, public works improvements and home construction, were considered vested at the time of Proposition 20, and thereby exempt from coastal development permit review. The last few phases of buildout have required City of Coronado and Coastal Commission review, as the specific development details were not available at the time the exemption was granted.

## B. STANDARD OF REVIEW

The standard of review for land use plans, or their amendments, is found in Section 30512 of the Coastal Act. This section requires the Commission to certify an LUP or LUP amendment if it finds that it meets the requirements of Chapter 3 of the Coastal Act. Specifically, it states:

Section 30512

(c) The Commission shall certify a land use plan, or any amendments thereto, if it finds that a land use plan meets the requirements of, and is in conformity with, the policies of Chapter 3 (commencing with Section 30200). Except as provided in paragraph (1) of subdivision (a), a decision to certify shall require a majority vote of the appointed membership of the Commission.

Pursuant to Section 30513 of the Coastal Act, the Commission may only reject zoning ordinances or other implementing actions, as well as their amendments, on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. The Commission shall take action by a majority vote of the Commissioners present.

C. PUBLIC PARTICIPATION

The City has held numerous local workshops, Planning Commission and City Council meetings with regard to the parking standard modifications proposed herein. All of these local hearings were duly noticed to the public. Notice of the subject amendment has been distributed to all known interested parties.

PART II. LOCAL COASTAL PROGRAM SUBMITTAL - RESOLUTIONS

Following a public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce the resolution and a staff recommendation are provided just prior to each resolution.

A. RESOLUTION I (Resolution to deny certification of the City of Coronado LCP Land Use Plan amendment, as submitted)

MOTION I

I move that the Commission certify the City of Coronado Land Use Plan Amendment #1-95, as submitted.

Staff Recommendation

Staff recommends a **NO** vote and the adoption of the following resolution and findings. An affirmative vote by a majority of the appointed Commissioners is needed to pass the motion.

Resolution I

The Commission hereby denies certification of the amendment request to the City of Coronado Land Use Plan, and adopts the findings stated below on the grounds that the amendment will not meet the requirements of and conform with the policies of Chapter 3 (commencing with Section 30200) of the California Coastal Act to the extent necessary to achieve the basic

state goals specified in Section 30001.5 of the Coastal Act; the land use plan, as amended, will not be consistent with applicable decisions of the Commission that shall guide local government actions pursuant to Section 30625(c); and certification of the land use plan amendment does not meet the requirements of Section 21080.5(d)(2)(i) of the California Environmental Quality Act, as there would be feasible measures or feasible alternatives which would substantially lessen significant adverse impacts on the environment.

- B. RESOLUTION II (Resolution to approve certification of the City of Coronado LCP Land Use Plan amendment, if modified)

MOTION II

I move that the Commission certify the City of Coronado Land Use Plan Amendment #1-95, if it is modified in conformance with the suggestions set forth in this staff report.

Staff Recommendation

Staff recommends a YES vote and the adoption of the following resolution and findings. An affirmative vote by a majority of the appointed Commissioners is needed to pass the motion.

Resolution II

The Commission hereby certifies the amendment request to the City of Coronado Land Use Plan, if modified, and adopts the findings stated below on the grounds that the amendment will meet the requirements of and conform with the policies of Chapter 3 (commencing with Section 30200) of the California Coastal Act to the extent necessary to achieve the basic state goals specified in Section 30001.5 of the Coastal Act; the land use plan, as amended, will contain a specific access component as required by Section 30500 of the Coastal Act; the land use plan, as amended, will be consistent with applicable decisions of the Commission that shall guide local government actions pursuant to Section 30625(c); and certification of the land use plan amendment does meet the requirements of Section 21080.5(d)(2)(i) of the California Environmental Quality Act, as there would be no feasible measures or feasible alternatives which would substantially lessen significant adverse impacts on the environment.

- C. RESOLUTION III (Resolution to reject the City of Coronado LCP Implementation Ordinance Amendment 1-95, as submitted)

MOTION III

I move that the Commission reject the City of Coronado Implementation Plan Amendment #1-95, as submitted.

Staff Recommendation

Staff recommends a YES vote and the adoption of the following resolution and findings. An affirmative vote by a majority of the Commissioners present is needed to pass the motion.

Resolution III

The Commission hereby denies certification of the amendment to the City of Coronado's Local Coastal Program on the grounds that the amendment does not conform with, and is inadequate to carry out, the provisions of the certified land use plan. There are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impacts which the approval would have on the environment.

- D. RESOLUTION IV (Resolution to approve certification of the City of Coronado LCP Implementation Ordinance Amendment 1-95, if modified)

MOTION IV

I move that the Commission approve the City of Coronado Implementation Plan Amendment 1-95, if it is modified in conformity with the suggested modifications set forth in this report.

Staff Recommendation

Staff recommends a YES vote and the adoption of the following resolution and findings. An affirmative vote by a majority of the Commissioners present is needed to pass the motion.

Resolution IV

The Commission hereby approves certification of the amendment to the City of Coronado's Local Coastal Program, if modified, on the grounds that, the amendment conforms with, and is adequate to carry out, the provisions of the certified land use plan. There are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impacts which the approval would have on the environment.

PART III. SUGGESTED MODIFICATIONS

Staff recommends the following suggested revisions to the City of Coronado LCP Land Use Plan and LCP Implementation Ordinances be adopted. The underlined sections represent language that the Commission suggests be added, and the ~~crossed-out~~ sections represent the language which the Commission suggests be deleted from the policy as originally submitted.

A. City of Coronado LCP Land Use Plan

1. LCP Land Use Plan Action Goals "18I" and "18J" are amended to read as follows:

I. Hotels or Existing Motels where Number of Units is Not Increased. One space per two habitable or dwelling units; one space per two employees, determined at the month, day and hour when the greatest number of employees are on duty; 20 percent of the parking spaces required by this Chapter for meeting halls; and 30 percent of the parking spaces required by this Chapter for all other uses on the site (e.g., restaurants, bars, nightclubs, general commercial or retail use, et cetera).

J. ~~/Repeated/~~ New Motels or Increase in Number of Units in Existing Motels. One space per habitable or dwelling unit; one space per two employees, determined at the month, day and hour when the greatest number of employees are on duty; and 100 percent of the parking spaces required by this Chapter for all other uses on the site (e.g., restaurants, bars, nightclubs, general commercial or retail use, et cetera).

B. City of Coronado LCP Implementation Ordinances

2. LCP Implementation Ordinance Nos. 86.58.030 "I" and "J" are amended to read as follows:

I. Hotels or Motels Existing on January 1, 1996, where Number of Units is Not Increased. One space per two habitable or dwelling units; one space per two employees, determined at the month, day and hour when the greatest number of employees are on duty; 20 percent of the parking spaces required by this Chapter for meeting halls; and 30 percent of the parking spaces required by this Chapter for all other uses on the site (e.g., restaurants, bars, nightclubs, general commercial or retail use, et cetera).

J. ~~/Repeated/~~ New Motels (constructed after January 1, 1996) or Increase in Number of Units in Motels Existing on January 1, 1996. One space per habitable or dwelling unit; one space per two employees, determined at the month, day and hour when the greatest number of employees are on duty; and 100 percent of the parking spaces required by this Chapter for all other uses on the site (e.g., restaurants, bars, nightclubs, general commercial or retail use, et cetera).

3. LCP Implementation Ordinance Nos. 86.04.360 and 86.04.505 are amended to read as follows:

86.04.360 Hotel. "Hotel" ~~or /Motel/~~ means a building or group of buildings on one site containing ~~two~~ three hundred and fifty (350) or more habitable or dwelling units available for "transient rental," which neither is a "boarding house" nor a "lodging house," and may include such integrated amenities as meeting halls, and dining, retail and recreation facilities.

86.04.505 Motel. "Motel" ~~or/wholly~~ means a building or group of buildings on one site containing between two or more and three hundred and fifty (350) habitable or dwelling units available for "transient rental," which neither is a "boarding house" nor a "lodging house," and may include such integrated amenities as meeting halls, and dining, retail and recreation facilities.

#### PART IV. FINDINGS FOR DENIAL OF THE LAND USE PLAN AMENDMENT. AS SUBMITTED

##### A. AMENDMENT DESCRIPTION

Resolution No. 7405 proposes to modify two existing Land Use Plan Action Goals (18I and 18J) by consolidating the parking requirements for both hotels and motels into Action Goal 18I and repealing 18J altogether. The existing action goals have established different parking standards for hotels and motels, with the provision that any transient lodging establishment of more than 350 rooms is a hotel, while one with 350 rooms or less is a motel. In the City of Coronado, the Hotel del Coronado and the Loews Coronado Bay Resort are classified as hotels; all others are motels. The proposed LUP amendment would remove the distinction between the two, and make the parking standard for all transient lodging the same. Currently, hotels are required to provide one parking space for every two units, one space for every two employees (calculated when the maximum number of employees are on duty), 20% of the spaces required for meeting halls and 30% of the spaces required for other accessory uses, including retail and restaurant. The motel standard requires one parking space for each unit, the same employee requirement, and 100% of the required parking for all other uses on site. Under the proposed LUP amendment, the standard to be applied to all transient lodging facilities in the future would be the less stringent hotel standard.

The amendment is proposed in an effort to encourage rehabilitation and upgrading of the existing smaller motel facilities in the City, which were primarily built prior to the current parking regulations and are not in conformance with the current standards. There are twelve motels existing in Coronado at this time, including the Le Meridien, which, since it contains fewer than 350 rooms, is classified as a motel rather than a hotel. As non-conforming structures, the ability for the property owners to perform site improvements is greatly diminished, since the City's ordinance Section 86.58.020 states, in part:

B. When an existing non-residential building is proposed to be structurally expanded or to have an expansion of floor area, for occupancy to be allowed, for construction plans to be approved and for a building permit or other entitlement to be issued for the proposed structural modification:

1. The structural or floor area expansion must not reduce existing parking on site below that which is required for the use or uses on site; and



2. Additional off-street parking required for the structural or floor area expansion by this Chapter must be provided. (Ord. 1786)

Under the current ordinance requirements for motels in the City of Coronado, not one of the twelve existing motels is in conformance with respect to providing adequate off-street parking. Thus, although motel owners can repair and maintain their units as they currently exist, almost any form of an upgrade would include minor structural expansions which would trigger the cited provisions and thus need to be addressed. The proposed amendment would result in ten of the twelve being in conformance with off-street parking requirements, and thus able to perform site improvements.

**B. CONFORMANCE WITH SECTION 30001.5 OF THE COASTAL ACT.**

The Commission finds, pursuant to Section 30512.2b of the Coastal Act, that the LCP amendment comprised in Resolution No. 7252, as set forth in the resolution for certification, is not consistent with the policies and requirements of Chapter 3 of the Coastal Act to the extent necessary to achieve the basic state goals specified in Section 30001.5 of the Coastal Act which states:

The Legislature further finds and declares that the basic goals of the state for the coastal zone are to:

- a) Protect, maintain and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and manmade resources.
- b) Assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state.
- c) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resource conservation principles and constitutionally protected rights of private property owners.
- d) Assure priority for coastal-dependent and coastal-related development over other developments on the coast.
- e) Encourage state and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial uses, including educational uses, in the coastal zone.

**C. NONCONFORMITY OF RESOLUTION NO. 7405 WITH CHAPTER 3 POLICIES OF THE COASTAL ACT.**

The proposed LUP amendment would consolidate two existing action goals in the LUP into a single goal for both hotels and motels, significantly reducing the amount of off-street parking required for motel use. The City's primary purpose in proposing this amendment is to provide some relief to current motel

owners, whose properties are all non-conforming to current standards, and thus restricted from making even minor improvements. The existing parking standards were appropriate when enacted, particularly for new development, but, with time, have unduly restricted even minor renovations at these existing facilities. The amended provisions would, however, also apply to anyone wishing to construct an entirely new facility. Those Chapter 3 policies of the Coastal Act most applicable to the proposed land use plan amendment state, in part:

Section 30210

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30213

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred. . . .

Section 30252

The location and amount of new development should maintain and enhance public access to the coast by ... (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation ... .

Motels can be sited in several locations within the City of Coronado. There is a "Hotel/Motel Zone" which covers two areas - at the end of the Coronado Bridge where the Le Meridien is located, and in the southern part of the city where the Hotel del Coronado, and several smaller facilities, exist. With approval of a Special Use Permit, motels are also allowed in the R-4 and CC Zones, which border Orange Avenue (Coronado's main street) along most of its length. The City of Coronado does not have any public parking lots for ocean beach visitors, although there are currently adequate on-street spaces to accommodate the normal level of users, with the exception of major summer holidays, when no beach community has adequate parking. There are a couple small public parking areas near San Diego Bay, where there are some public park and shoreline amenities. However, use of the bay shoreline areas is significantly less than use of the ocean shoreline, which is the primary destination of most Coronado beach visitors.

The R-4 locations, where several motels currently exist, and others could be sited, are remote from the more popular oceanfront beaches, but not too distant from the Bay. As stated, there are some public parking areas in this part of Coronado, and use of the Bay's shoreline is light at present. However, as regional population increases continue, all shoreline areas will become more heavily used. Based on testimony submitted during the local hearing process, and discussions with motel owners, the motels located in the R-4 Zone of the City have a high level of military use, since they are sited near the North Island Naval Air Station. This type of use is expected to continue for out-of-town military personnel on short-term assignments at North Island, although it may decrease somewhat since the Navy is currently expanding its on-base lodging facility. Most of the military users are transported on- and off-base by Navy vans or buses, and thus do not maintain private cars at the motels. Both because of the existing type of use, and the remoteness of this zone from the ocean, a reduction in parking standards for these existing facilities is not seen as having a significant adverse impact on public beach access. As proposed, however, motels located in the R-4 Zone cannot be distinguished from motels located elsewhere, where such concerns are much higher.

The CC Zone occupies the southern part of Orange Avenue, and comprises Coronado's main business district. Motels sited within this zone are no more than three or four blocks from the ocean. Reduced on-site parking requirements could result in motel visitors parking on the public streets, which currently provide the only parking reservoir for beach users. This concern pertains primarily to the siting of new facilities, since there is not an identified "spillover" problem from the existing motels, some of which are grossly deficient in parking. Short of adding additional units, upgrading and minor expansions of existing motels are not anticipated to significantly affect the current beach parking patterns in near-ocean locations. However, adding additional units to existing motels, or allowing new motels to be constructed under the proposed parking guidelines could severely diminish the existing parking reservoir and, thus, adversely impact public beach access to Coronado's shoreline.

Finally, the "Hotel/Motel Zone" is located in particularly sensitive areas with respect to public beach access. That portion of the zone near the end of the Coronado Bridge covers an area that is actually Port of San Diego land (the Le Meridien site) and thus is not under the City's control. The Port, did take Coronado's parking standards into consideration when permitting construction of the Le Meridien, which comes closer than most motels to meeting Coronado's requirements. However, since this part of the "Hotel/Motel Zone" is not technically within Coronado's certified LCP, it will not be further considered in these findings.

The southern "Hotel/Motel Zone" covers the site of the Hotel del Coronado, whose parking standards are not affected by the proposed LUP amendment, since it is classified as a hotel already. Also within that zone are three existing motels, as well as three other properties which the City identifies as likely sites for new motel development. This zone covers both sides of Orange Avenue, and all properties in the zone are within one block of the public

beach. If the number of motel units is increased on any of the existing sites, or new motels were to be developed within this zone under the proposed parking standards, the potential for "spillover effects" on the public street parking reservoir is extreme. Again, the effects of allowing renovations and minor expansions, which do not include additional motel units, are deemed to be insignificant, but the proposed LUP amendment makes no distinction between these types of development. Therefore, the Commission finds the proposed LUP amendment, as it would apply to both renovations and additional motel units, as well as new motel development altogether, inconsistent with Sections 30210, 30211 and 30252 of the Act, which protect public access to the shoreline.

#### PART V. FINDINGS FOR APPROVAL OF THE LAND USE PLAN AMENDMENT, IF MODIFIED.

As proposed, the City's revised LUP policy language is not fully consistent with the access policies of the Coastal Act. There is a significant potential for public parking reservoirs (the streets within a three to four block radius of the beach) to be adversely impacted by the construction of additional motel units or new motel development if the proposed, reduced parking standards are allowed. The City submitted a survey it took of 115 cities in California, in an effort to compare Coronado's parking standards for motels with those of other communities. Out of the 115 cities surveyed, 45 have a flat standard of one space for each motel unit. The remainder have multiple variations of parking standards, including requirements for manager units, employees and requirements based on square footage rather than number of units. However, only 15 of the municipalities have a ratio that is (or might be, for those based on square footage) less than one parking space per unit. Moreover, only a couple of the cities listed included parking standards for accessory uses, which would lead one to assume that these uses would have additional requirements, not included in the survey, for such amenities. Although the City maintains that the survey implies that Coronado's motel parking standards are too stringent, the Commission does not find that position supported by the facts. Rather, the survey appears to substantiate that most (i.e., 100 out of 115) have parking standards equal to Coronado's existing ones.

The City believes its unique setting on a peninsula may make it less of a regional beach destination than some other areas like Pacific Beach, La Jolla, Del Mar or Carlsbad, since it can only be reached by bridge, ferry or a long drive up the Silver Strand from Imperial Beach. Moreover, the City believes the type of motel use in Coronado may differ somewhat from other communities, since, based on a survey conducted by the City and discussions with lodging interests, a smaller percentage of patrons appear to arrive by private car here than in other areas. This is attributed both to the military uses cited in the prior finding and to the fact that much of the motel business in the southern part of the City is derived from conventions at the Hotel del Coronado. Many conventioners seek less expensive lodgings in the area, rather than stay at the Hotel del Coronado, which is a luxury resort. Typically, convention attendees arrive via public transport rather than private vehicle. Whether for these or other reasons, with the exception of summer holidays which overwhelm all the region's beach communities, adequate recreational parking has typically been available in Coronado.

Thus, based on the knowledge that Coronado is not presently experiencing a significant public parking problem for beach visitors, even though all of the existing motels have a parking deficit, the Commission finds that some relief from the existing standards can be approved. Where existing motels wish to upgrade their facilities, without increasing the number of motel units, the Commission finds the proposed parking standard, which reduces the requirement for all but employee parking, is appropriate and will not result in adverse impacts on public parking. This reduced parking standard should allow the more moderate visitor accommodations in Coronado to continue in business, and upgrade existing facilities. The retention of affordable lodging is a priority under Section 30213 of the Coastal Act. Since the continuance of the existing motels at their current number of units should not result in public street spaces being usurped by motel guests, the Commission finds it appropriate to grant relief from the standards which resulted in all existing motels in Coronado being classified as structurally non-conforming. It must be noted that these structural non-conforming motels were consistent with the City's zoning and parking requirements when first built; the standards changed over time, but these facilities have long been in existence. They are so constructed on their sites that it is not now possible to increase on-site parking without removing portions of the motels.

This same argument cannot be made for new motels which could be sited in near-shore areas, since these can and should be designed to accommodate the necessary amount of parking on-site, based on the standards of the certified LCP. Likewise, in cases where the owner of an existing motel proposes to increase the number of units, the more stringent parking standard of the existing, certified LUP should be applied. When the number of units increases, the number of guests with cars is likely to increase as well. Although Coronado does not appear to suffer a serious parking shortfall at present, neither does it have a discernable surplus. Thus, additional motel units will only aggravate the situation, and could, if permitted under reduced parking standards, cumulatively result in a public beach parking deficit. Therefore, Suggested Modification #1 is included to address the construction of new motels in Coronado, or renovations of existing motels that result in an increase of motel units. This modification would retain the current ratio of one parking space per motel unit, the existing employee standard, and 100% of the spaces required for accessory uses for any motel constructed after January 1, 1996, or for any existing motel which increases the number of units after that date. Only with this suggested modification can the Commission find the proposed LUP amendment consistent with the cited Chapter 3 policies of the Coastal Act.

PART VI. FINDINGS FOR DENIAL OF THE IMPLEMENTATION PLAN AMENDMENT, AS SUBMITTED.

A. AMENDMENT DESCRIPTION.

The City of Coronado has proposed revised ordinance sections to consolidate the parking requirements for motels with that for hotels, and new definitions of "hotel" and "motel" to facilitate the parking standard modifications. The

parking standards are currently contained in Sub-sections 86.58.030 "I" and "J" of the Coronado Municipal Code, and the definitions are contained in Sections 86.04.360 and 86.04.505.

## 1. Off-Street Parking

a) Purpose and Intent of the Ordinance. Section 86.58 of the Municipal Code contains the off-street parking regulations for the City. Its purpose is to assure that adequate off-street parking is provided to maintain good traffic circulation, assist businesses and maintain property values.

b) Major Provisions of the Ordinance. The ordinance establishes minimum standards based on the zone classification and type of land use. It also provides general guidance pertaining to when the standards are applied (i.e., what levels and types of development trigger the standards).

c) Adequacy of the Ordinance to Implement the Certified Land Use Plan. The language in these ordinance sections is identical to that in the Land Use Plan, and the proposed amendment for the ordinances is thus identical to that described previously. Section "J" containing the separate motel standard would be repealed, and Section "I" containing the hotel standard would be modified to apply to both hotels and motels. The LUP amendment has been found inconsistent with the Coastal Act as submitted and the suggested modification retains two separate parking standards. Under the suggested modifications, renovations and limited modifications to motels existing on January 1, 1996 would be accommodated under the revised standard (existing hotel standard). However, construction of new motels, or an increase in the number of units at existing motels, would be regulated by the current, more stringent, motel standard. Thus the proposed changes to the LCP Implementing Ordinances are not consistent with, and are unable to carry out, the amended LUP, since the proposed amendment would delete the current motel standard altogether.

## 2. Definitions

a) Purpose and Intent of the Ordinance. Chapter 86.04 of the Municipal Code contains definitions for the various terms used throughout the remainder of the ordinances. Its intent is to avoid confusion or ambiguity where a number of different interpretations could be given to a single term.

b) Major Provisions of the Ordinance. The ordinance contains a list of terms and their meanings.

c) Adequacy of the Ordinance to Implement the Certified Land Use Plan. The existing code includes separate definitions for hotels and motels; the distinction is based on the number of units, with any facility having more than 350 guest units being classified as a hotel and any with less than 350 guest units being classified as a motel. As proposed in Resolution No. 7405, the Code would retain separate entries, and reword the definition, but the new definition would be the same for both "Hotels" and "Motels." The reference to number of units is removed from both definitions.

Since the LUP amendment has been found inconsistent with the Coastal Act, and can only be approved with suggested modifications, the proposed definitions are not in conformity with, and are not adequate to carry out, the amended land use plan. It is necessary to retain a reference to the number of units, since a different parking standard for some motel improvements is included in the amendment, as modified. A certified definition must allow the City, as well as current or prospective owners, to clearly understand whether their facility is classified as a "hotel" or a "motel."

PART VII. FINDINGS FOR APPROVAL OF THE IMPLEMENTATION PLAN AMENDMENT, IF MODIFIED.

The Commission finds the currently proposed ordinance revisions can only be approved if modified to be consistent with the modified LUP amendment. Since the off-street parking ordinance language is identical to the LUP language, Suggested Modification #2 is identical to Suggested Modification #1. This delineates the off-street parking requirements for hotel/motel uses, allowing the reduced standard for motels existing on January 1, 1996 which do not increase the number of units. The current, more stringent, motel standard is retained for motels existing on January 1, 1996 which increase the number of units, and for any construction of new motels. Suggested Modification #3 includes new definitions for "hotels" and "motels" and is very similar to the language proposed by the City of Coronado. However, the modified definitions include a reference to the number of units to distinguish the two forms of development from one another. With these modifications, the Commission finds the proposed ordinances are in conformity with, and adequate to carry out, the Land Use Plan, as certified with suggested modifications.

PART VIII. CALIFORNIA ENVIRONMENTAL QUALITY ACT CONSIDERATIONS.

Section 21080.9 of the California Environmental Quality Act (CEQA) exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its local coastal program or amendments to it. Instead, the CEQA responsibilities are assigned to the Coastal Commission. However, the Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process [see Section 15251(f) of the CEQA guidelines.] Thus, under CEQA, both the Commission and local government are relieved of the responsibility to prepare an EIR for each LCP or amendment thereof. Nevertheless, the Commission is required in an LCP amendment submittal to find that the LCP amendment does conform with CEQA provisions. In the case of the subject LCP amendment request, the Commission finds that approval of the amendment, as submitted, would result in significant environmental impacts under the meaning of the California Environmental Quality Act.

Specifically, the LCP amendment would limit the public's ability to gain access to the City's shoreline by reducing the parking standards for new motels and for motels increasing the existing number of units. Reduced on-site parking could result in the use of street parking by motel guests;

near Coronado's shoreline, street parking is the only public parking reservoir available for beach visitors. Thus, the Commission finds that the subject LCP amendment request could result in significant environmental impacts under the meaning of the California Environmental Quality Act. The suggested modifications resolve this issue by requiring that new motels, and existing motels increasing the number of units, observe the more stringent parking requirements of the current implementation plan. Therefore, the Commission finds that no significant, unmitigable environmental impacts under the meaning of CEQA will result from the approval of the proposed amendment, with the inclusion of the suggested modifications.

(0805A)



**RESOLUTION NO. 7405**

**A RESOLUTION OF THE CITY COUNCIL  
OF THE CITY OF CORONADO, CALIFORNIA,  
TO AMEND THE CITY OF CORONADO  
LOCAL COASTAL PROGRAM LAND USE PLAN  
AND IMPLEMENTATION ORDINANCES  
CONCERNING THE DEFINITION AND PARKING STANDARD  
FOR HOTELS AND MOTELS**

WHEREAS, the City of Coronado has adopted a General Plan and a Local Coastal Program (LCP);

WHEREAS, the City of Coronado has initiated a process to revise and update the regulation of hotels and motels in the City;

WHEREAS, the Coronado City Council and Planning Commission have determined in Public Hearings that hotels and motels have a similar impact on the community, and should therefore have the same definition and parking standard;

WHEREAS, the Coronado City Council and Planning Commission have determined in Public Hearings that the proposed LCP and Municipal Code amendments under review are consistent with the policies and goals of the Coronado General Plan and the remaining portions of the Coronado Local Coastal Program; and

WHEREAS, said public hearings were duly noticed as required by law and all persons desiring to be heard were heard at said hearings.

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Coronado, California, that the City of Coronado LCP LAND USE PLAN and IMPLEMENTATION ORDINANCES concerning the definition and parking standard for hotels and motels are amended as follows:

SECTION ONE: LCP Land Use Plan Action Goals "I8I" and "I8J" are amended to read as follows:

- I. Hotels or Motels. One space per two habitable or dwelling units; one space per two employees, determined at the month, day and hour when the greatest number of employees are on duty; 20 percent of the parking spaces required by this Chapter for meeting halls; and 30 percent of the parking spaces required by this Chapter for all other uses on the site (e.g., restaurants, bars, nightclubs, general commercial or retail use, et cetera).

*Coronado LCPA 1-95*

J. Repealed.

**SECTION TWO:** LCP Implementation Ordinances are amended per Section One above as Sub-sections 86.58.030 "I" and "J" of the Coronado Municipal Code.

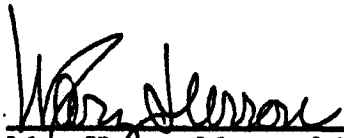
**SECTION THREE:** LCP Implementation Ordinances are amended to add the following definitions for "Hotel" and "Motel":

**86.04.360 Hotel.** "Hotel" or "Motel" means a building or group of buildings on one site containing two or more habitable or dwelling units available for "transient rental", which neither is a "boarding house" nor a "lodging house", and may include such integrated amenities as meeting halls, and dining, retail and recreation facilities.

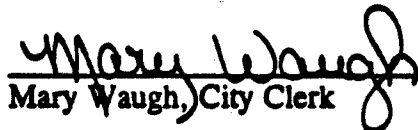
**86.04.505 Motel.** "Motel" or "Hotel" means a building or group of buildings on one site containing two or more habitable or dwelling units available for "transient rental", which neither is a "boarding house" nor a "lodging house", and may include such integrated amenities as meeting halls, and dining, retail and recreation facilities.

**PASSED AND ADOPTED** by the City Council of the City of Coronado, California, this 7th day of Nov, 1995, by the following vote, to wit:

<b>AYES:</b>	HERRON, SMISEK, SCHMIDT, BLUMENTHAL, WILLIAMS
<b>NAYS:</b>	NONE
<b>ABSENT:</b>	NONE
<b>ABSTAIN:</b>	NONE

  
\_\_\_\_\_  
Mary Horton, Mayor of the  
City of Coronado

**Attest:**

  
\_\_\_\_\_  
Mary Waugh, City Clerk

*Coronado LCPA 1-95*



CORONADO  
LODGING  
ASSOCIATION

RECEIVED

JAN 11 1996

CALIFORNIA  
COASTAL COMMISSION  
SAN DIEGO COAST DISTRICT

January 10, 1996

Ms. Ellen Lirley, Coastal Planner  
California Coastal Commission  
San Diego Area  
3111 Camino Del Rio North, Suite 200  
San Diego, CA 92108-1725

RE: City of Coronado LCP Amendment - Hotel / Motel Parking.

Dear Ms. Lirley:

The review process for the City of Coronado Hotel/Motel Design Standards was initiated by the Coronado City Council early in 1991. While the issues originally targeted were structural in nature i.e. coverage, F.A.R., facades, and setbacks, the focus eventually was broadened to encompass other issues of crucial importance to the Coronado Lodging Industry. These included the parking requirements and the grandfathering of non-conforming uses provisions, both of which were in dire need of attention and revision.

The concerns raised by the members of the Coronado Lodging Association pertained to their non-conforming status and the resulting risk associated therewith (ability to finance, remodel, and rebuild) due in large part to the parking requirements associated with "motels", a "motel" being simply defined as a "hotel" of less than 350 rooms. In fact, in Coronado, there are only 2 "hotels" (Hotel Del Coronado and Loews). The Le Meridien Resort was built as a "motel" and was thus required to provide parking of double that required of a "hotel" or 1 space per room. In order to validate the claims of our members that this standard did not represent the actual use and needs experienced by our industry, the City of Coronado conducted a survey of all Coronado lodging establishments where each was asked to research its registration records to determine the actual parking demands in Coronado.

The results clearly pointed out the quite unique character of Coronado as a destination resort, whether guests stayed at an expensive location such as the Loews or at a more affordable one such as La Avenida Inn. The documented parking demand from both hotels and motels clearly indicated that the existing standards for "motels" were well above and beyond what was needed and could be reduced without causing any negative impacts on other parking since we were dealing with superfluous and unneeded private parking.

Reduction of these requirements, while not bringing all "motels" into total compliance, does, however, give an opportunity for those of us with more than sufficient parking to add landscaping or other amenities to improve our properties rather than leave them covered with pavement.

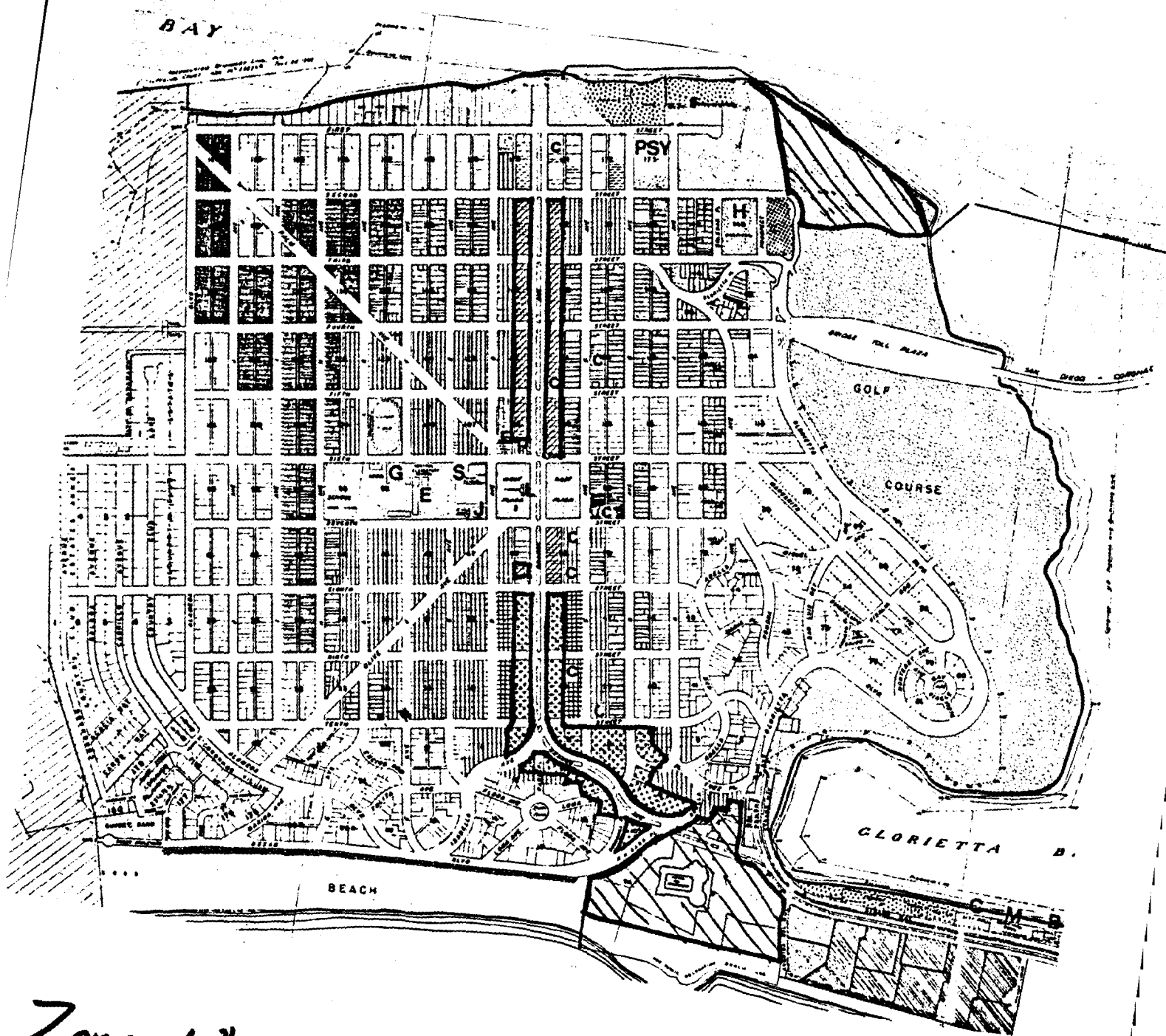
It is our hope that you and the Commission will recognize the advisability of reducing these standards to a level more commensurate with the Coronado demand and character as there was no opposition to this proposal from the community during the complete zone standards revision process.

Sincerely,



Gus Theberge, President

Coronado LCPA 1-95



Zones Where Hotels/Motels are Allowed:

Hotel/Motel Zone

CC Zone

R-4 Zone



Coronado / CA 92012

# Motel Parking Standards in Other California Cities

## Municipal Parking Standards for 115 Selected California Cities\* -Hotels-

The following Cities have a standard of 1 parking space for every room or unit:

Alhambra, Bakersfield, Beverly Hills, Buena Park, Burlingame, Cerritos, Chico, Claremont, Commerce, Compton, Cypress, El Monte, Fresno, Fullerton, Glendale, Glendora, Hawthorne, La Habra, Lancaster, Long Beach, Lynwood, Modesto, Monterey Park, Oakland, Oceanside, Orange, Orange City, Palo Alto, Paramount, Pasadena, Pico Rivera, Redondo Beach, Redwood City, Rosemead, Salinas, San Carlos, San Diego, Santa Clara, Santa Rosa, So. Pasadena, Temple City, Thousand Oaks, Vallejo, Visalia, West Covina.

The remaining Cities surveyed have the following standards:

Alameda: 1½ guest plus 1 resident manager  
Anaheim: .8/unit w/o kitchen; 1 3/5/unit w/kitchen  
Aracadia: 1.2/guest  
Baldwin Park: 2 + 1/unit  
Ball Gardens: 2/unit w/kitchen; 1/unit w/o kitchen  
Bellflower: 1½/unit  
Berkeley: 1/3 guests + 1/3 employees or 1/room  
Burbank: 1/room 0-50 rooms; 1½/2 rooms 51-100 rooms; 1/3 rooms 101 + rooms  
Carson: 2/unit w/kitchen; 1/unit w/o kitchen + 2/resident  
Chula Vista: 1/unit + 1/25 rooms  
Concord: 1.2/unit  
Costa Mesa: 1/2 units + 10/1000 for 1st 3000 SF; 20/1000 for additional SF  
Covina: 1/unit + 1/employee  
Culver City: 1/2 guest rooms  
Daly City: 1/room + 1/300 SF of gross floor area for office  
Downey: 1/sleeping; 1/kitchen + 1/5 units  
El Segundo: 1/1st 100 rooms; ¾/2nd 100 rooms; ½/above 200 rooms  
Escondido: 1/sleeping unit + 1/manager  
Fairfield: 1.1/unit  
Foster City: 1/room + 2 for manager  
Fremont: 5 + 1/room  
Gardena: 1/bedroom + 1/6 rooms (minimum of 3/employee)  
Garden Grove: 1/unit; 2/manager  
Hayward: 1/room + 1/2 employees

\* Excerpts from this January 1992 document by International Parking Design, Inc.

Hermosa Beach: 1/unit 1-50 units; 1½/unit 50-100 units; 2/unit 100+ units  
 Huntington Beach: 1/unit + 1 employee space/10 guest rooms + 2 spaces/managers units  
 Huntington Park: 1/room; 1/2 employees  
 Inglewood: 2 spaces + 1/unit  
 Irvine: Determined by parking study  
 La Mesa: 1/sleeping unit + auxiliary  
 La Mirada: 5 stalls + 1/sleeping unit  
 La Puente: 1/unit w/kitchen (enclosed); 1/unit w/o kitchen (open)  
 Laguna Beach: 1/unit + 1/15 units  
 Lakewood: 1/2 rooms  
 Lawndale: 1/kitchen unit; 2/room + 1/manager + 1/2 employees  
 Livermore: 1/unit + 1/10 units + 1/3 seating (dining)  
 Los Angeles: 1/500 SF  
 Los Angeles County: 1/2 guest rooms + 1/suite  
 Manhattan Beach: 1.1/unit  
 Montebello: 1/room + 2 covered for manager room if it has kitchen  
 Monterey: 1/room + 2 for every 50 rooms  
 Mountain View: 1/room + 1/2 employees on largest shift  
 Newport Beach: 1/2 units (in residential district not commercial)  
 Norwalk: 1/2 units  
 Ontario: greater of 1/unit or 1/2 beds  
 Oxnard: 1/unit; 2/unit w/kitchen  
 Palm Springs: 1/room 0-50 rooms; + .75 for 50+ rooms  
 Pomona: 1.1/unit  
 Richmond: 1/500 SF  
 Riverside: 1/250 SF or 1/500 SF  
 Sacramento: 1/2 rooms; 1/manager or owner  
 San Bernadino: 1.1/unit + 1/50 SF of main assembly area + 2/managers units  
 San Buenaventura: 1 and 1/8 per sleeping unit  
 San Francisco: 23+ rooms 1/16 rooms + 1/manager  
 San Jose: 1/room + 1/employee  
 San Leandro: 1/3 rooms  
 San Luis Obispo: 1/room + 1/manager  
 San Mateo: 1/unit + 2/manager  
 Santa Ana: 1/2 guest rooms  
 Santa Barbara: 1/sleeping unit + bicycle parking  
 Santa Monica: 1/room + 1/200 SF of other areas  
 Simi Valley: 1/room + 1/100 SF of eating area + 1/72 SF of banquet area + 1/3 employees  
 South Gate: 1/unit + 2/manager  
 South San Francisco: 1/unit + 2/managers unit + ½/10 rooms (airport hotels differ)  
 Stockton: 1/2 rooms  
 Sunnyvale: 1/room + 1/employee  
 Tustin: 1/unit + 1/manager + 1/employee  
 Upland: 2/unit 1-40 units; 1/4 units 40+ units  
 Walnut Creek: 0.9/room

cd/ed/pc292x

Coronado LCRA 1-95

