

CALIFORNIA COASTAL COMMISSION

SAN DIEGO COAST AREA
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March 14, 1996



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TO: COMMISSIONERS AND INTERESTED PERSONS

FROM: CHARLES DAMM, SOUTH COAST DISTRICT DIRECTOR
 DEBORAH N. LEE, ASSISTANT DISTRICT DIRECTOR, SAN DIEGO AREA OFFICE
 ELLEN LIRLEY, COASTAL PLANNER, SAN DIEGO AREA OFFICE

SUBJECT: REVISED FINDINGS FOR CERTIFICATION OF CITY OF CORONADO LOCAL
 COASTAL PROGRAM AMENDMENT NO. 1-95 (Hotel/Motel Parking)
 (For Public Hearing and Possible Final Action at the Meeting of
 April 9-12, 1996)

SYNOPSISSUMMARY OF COMMISSION ACTION

At its meeting of February 8, 1996, the Coastal Commission reviewed the City of Coronado Major Amendment 1-95 to the City's certified local coastal program (LCP). In its action, the Commission approved, as submitted, the City's proposed modifications to its land use plan and implementing ordinances.

COMMISSION VOTES

1. Coronado Land Use Plan, approve as submitted:

Commissioners Voting "Yes": Cava, Calcagno, Doo, Flemming, Carpenter, Karas, Pavley, Rick, Wright and Wan

Commissioners Voting "No": None

2. Coronado Implementation Plan, reject as submitted:

Commissioners Voting "Yes": None

Commissioners Voting "No": Cava, Calcagno, Doo, Flemming, Carpenter, Karas, Pavley, Rick, Wright and Wan

SUMMARY OF AMENDMENT REQUEST

The submittal consisted 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.

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 Revised Findings for 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.

PART I. OVERVIEW

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.

C. 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.

D. 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

The Commission adopted the following resolutions and findings following the public hearing.

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

Resolution I

The Commission hereby approves 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 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 meets the requirements of Section 21080.5(d)(2)(i) of the California Environmental Quality Act, as there are no feasible mitigation measures or feasible alternatives which would substantially lessen significant adverse impacts on the environment.

- B. RESOLUTION II (Resolution to approve the City of Coronado LCP Implementation Ordinance Amendment 1-95, as submitted)

Resolution II

The Commission hereby approves certification of the amendment to the City of Coronado's Local Coastal Program 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. FINDINGS FOR APPROVAL 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 structural expansions or additional motel units 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 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. CONFORMITY 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 restricted even minor renovations at these existing facilities. Moreover, it is the City's belief that the desired renovations would not be financially feasible for most motel owners if they could not also add new motel units to increase income and offset the cost of renovation. Of course, the amended provisions would also apply to the construction of entirely new facilities. 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 has only one public parking lot for ocean beach visitors, which is located south of the Hotel del Coronado, within the Coronado Shores residential development, and contains approximately 100 spaces. Thus, needed parking for most of the beachfront area is accommodated by on-street public parking spaces only. However, 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 at the Commission hearing in February, 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.

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. Although reduced on-site parking requirements could result in motel visitors parking on the public streets, which currently provide the primary parking reservoir for beach users, there is not an identified "spillover" problem from the existing motels, some of which are severely 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 potentially create beach access conflicts where none now exist.

Finally, the "Hotel/Motel Zone" is located in particularly sensitive areas with respect to public beach access. The 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 the only 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 increased.

However, the City maintains 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 previously 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 staying 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.

Another rationale supporting the proposed parking standards is the general pattern of use for Coronado's motels. Most visitors staying in Coronado spend their daytimes away from the motels visiting the various attractions that the San Diego region offers. Thus, motel parking is generally an overnight use only, and does not thereby compete with the prime day-use beach visitor parking demand, which peaks from late morning until late afternoon. 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. 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 beach 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 and 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.

Although new motels could also be constructed utilizing the proposed parking standards, there are few opportunities available within the built-out community for such to occur. For the most part, there are no vacant lots in Coronado, so the development of new motels would require the demolition of existing uses, which already generate some level of parking need. Moreover, any new motels would have to accommodate the full required amount of parking on-site, based on the standards of the certified LCP as amended herein. In addition, the City of Coronado enjoys a unique pedestrian atmosphere, wherein virtually all of the recreational and commercial amenities are within walking distance from any part of the city. The City also provides both regular transit service, which operates within the community and connects with downtown San Diego and Imperial Beach, and a shuttle/tram servicing the main commercial and guest lodging areas of the community itself.

In summary, the Commission finds the reduced parking standard for motels in Coronado consistent with the cited access and recreation policies of the Coastal Act, although a similar finding may not be possible for other beach communities. This can be attributed to several things, including the unique setting and pedestrian orientation of Coronado, the types and patterns of use of visitor accommodations in Coronado (military, convention, etc.), and the availability of ample, free, on-street parking in nearshore areas. For these or other reasons, Coronado does not appear to suffer any public beach parking shortfall at present. Thus, the relatively small number of additional motel units which could conceivably be built in Coronado will not negatively impact the existing public parking situation and will not cumulatively result in a serious impact on beach parking. Therefore, the Commission approves the proposed land use plan amendment, as submitted.

PART IV. FINDINGS FOR APPROVAL 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 incorporate 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 consistent with the Coastal Act as submitted. Thus the proposed changes to the LCP Implementing Ordinances are consistent with, and are able to carry out, the amended LUP.

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 consistent with the Coastal Act, the proposed definitions are in conformity with, and are adequate to carry out, the amended land use plan.

PART V. 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 not result in significant environmental impacts under the meaning of the California Environmental Quality Act. Specifically, the LCP amendment, although reducing the parking standards for both new and existing motels, would not limit the public's ability to gain access to the City's shoreline, due to the availability of adequate on-street parking facilities for beach visitors and the unique characteristics of the community itself. Therefore, the Commission finds that no significant, unmitigable environmental impacts under the meaning of CEQA will result from the approval of the proposed amendment, as submitted by the City of Coronado.

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