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CALIFORNIA COASTAL COMMISSION

SAN DIEGO COAST AREA
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August 20, 1996

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. 1-96 (A. Off-Street Parking Associated with Mixed-Use Development; B. Modification of Landscaping Standards; C. Off-Street Parking Additions to the Land Use Plan; D. Civic-Use/Open Space Redesignations; E. Decal Parking; F. Coastal Development Permit Ordinance) (For Public Hearing and Possible Final Action at the Meeting of September 10-13, 1996)

SYNOPSIS

SUMMARY OF COMMISSION ACTION

At its meeting of July 12, 1996, the Coastal Commission reviewed the City of Coronado Major Amendment 1-96 to the City's certified local coastal program (LCP). In its action, the Commission approved, as submitted, the City's proposed amendments to the landscaping and parking provisions of the land use plan and corresponding changes to the implementing ordinances, along with clarification of some land use designations. It also approved, with suggested modifications, amendments to the certified implementing ordinances addressing expansion of the decal parking program and coastal development permits.

COMMISSION VOTES

1. Coronado Land Use Plan, approve as submitted;

Commissioners Voting "Yes": Belgard, Flemming, Giacomini, Pavley, Randa, Rick, Staffel, Steinberg, Wan, Wear and Chairman Calcagno

Commissioners Voting "No": None

2. Coronado Implementation Plan, reject as submitted (landscaping and parking standards):

Commissioners Voting "Yes": None

Commissioners Voting "No": Belgard, Flemming, Giacomini, Pavley, Randa, Rick, Staffel, Steinberg, Wan, Wear and Chairman Calcagno

3. Coronado Implementation Plan, reject the Decal Parking and CDP Ordinance portions, as submitted:

Commissioners Voting "Yes": Areias, Belgard, Flemming, Giacomini, Pavley, Randa, Rick, Staffel, Steinberg, Wan, Wear and Chairman Calcagno

Commissioners Voting "No": None

4. Coronado Implementation Plan, approve the Decal Parking and CDP Ordinance portions, as modified:

Commissioners Voting "Yes": Areias, Belgard, Flemming, Giacomini, Pavley, Randa, Rick, Staffel, Steinberg, Wan, Wear and Chairman Calcagno

Commissioners Voting "No": None

SUMMARY OF AMENDMENT REQUEST

This submittal consisted of amendments to both the certified land use plan and implementing ordinances addressing several elements of the City's Local Coastal Program. One land use plan amendment would add new parking standards for mixed-use developments (including a reduced standard for mixed-use projects which include an affordable housing component). Second, a new table addressing the landscaping standards in all City zones is proposed for inclusion in the land use plan. Also, the addition of parking standards for schools and classrooms, drive-up windows, parking lots or structures to the LUP is proposed to make it consistent with existing zoning. Finally, the land use plan map is being modified to eliminate the dual "Civic Use/Open Space" designation and redesignate all properties thus shown to reflect either a "Civic Use" or "Open Space" designation.

The proposed implementing ordinance amendments include an expansion of the existing decal parking program to include an approximately six-block distance from the First and Fourth Street gates to the Naval Air Station North Island (NASNI). Also proposed are new landscaping standards for the CC, LC, HM, PCD, R-4 and R-3 Zones, the addition of parking standards for mixed-use developments to the Off-Street Parking Ordinance, and an amendment to Section 86.36.040, a portion of the City's Coastal Development Permit Ordinance, to further clarify when coastal permits are required.

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 four previous amendments to the implementing ordinances.

ADDITIONAL INFORMATION

Further information on the Revised Findings for City of Coronado LCP Amendment #1-96 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. 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 four 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 LCP 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 #1-96, 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 a portion of the City of Coronado LCP Implementation Ordinance Amendment #1-96, 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.

- C. RESOLUTION III (Resolution to reject portions of the City of Coronado LCP Implementation Ordinance Amendment #1-96, as submitted)

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 portions of the City of Coronado LCP Implementation Ordinance Amendment #1-96, if modified)

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 MODIFICATION

The Commission adopted the following suggested revisions to the City of Coronado LCP Implementation Ordinances. The underlined sections represent language that the Commission suggests be added to the ordinances as originally submitted.

- 1) Exhibit "A" of Resolution 7425, specifying the boundaries of the expanded permit parking zone, shall be revised to read:

After five (5) years, the City of Coronado expanded decal parking program within the 800 and 900 blocks of First Street shall be terminated unless extended for an additional period of time by the Coastal Commission. To support such an extension, the City shall demonstrate that existing public parking (on-street within the 800 and 900 blocks of First Street and within the 66-space public parking lot at the foot of E Street) is adequate to serve the needs of visitors to the Harbor View Park (SDG&E park), Centennial Park (old Ferry Landing site) and other nearby tourist/beachgoer attractions. In this regard, the City shall monitor/document the number of parking spaces utilized (or vacant) during the peak season (Memorial Day weekend to Labor Day). Parking counts shall be taken on at least two weekend days (Saturdays or Sundays) between the hours of 12:00 and 4:00 p.m. during each of the summer months (June, July and August). The Local Coastal Program amendment expands the decal parking district to include the following properties:

100, 200, and 300 block of E Avenue (both sides)
100, 200, and 300 block of F Avenue (both sides)
100, 200, and 300 block of G Avenue (both sides)
300 and 400 block of H Avenue (both sides)
300 and 400 block of I Avenue (both sides)
500 block of G Avenue (west side)
500 block of H Avenue (both sides)
500 block of I Avenue (both sides)
500 block of J Avenue (both sides)
700, 800, and 900 block of First Street (both sides)
600, 700, 800, and 900 block of Second Street (both sides)
600, 700, 800, and 900 block of Third Street (both sides)
400 and 500 block of Third Street (south side)
300 block of Palm Avenue (both sides)
400 and 500 block of Fourth Street (both sides)
600, 700, 800, and 900 block of Fourth Street (north side)
West half of 600 block of Fourth Street (south side)
600 block of Fifth Street (south side)
West half of 600 block of Fifth Street (north side)
400, 500, 600 block of Sixth Street (north side)
400 block of Sixth Street (south side)

- 2) An additional sentence shall be added to the end of Subsection 86.70.060"A" of the Coronado Municipal Code, as follows:

A. Those uses or activities permitted for a particular zone by the Coronado Municipal Code which do not require a discretionary action on the part of the City (i.e., Planning Commission or City Council interpretation, issuance of a Major Special Use Permit, or issuance of a variance to either the regulation of the amount of landscaping required or to any standard in Chapters 86.58, 86.64, 86.70, 86.72, 86/74, 86.76) shall be exempt in that zone from the City Coastal Permit process for those areas that are neither under the California Coastal Commission appeal authority nor within the Coastal Commission's direct permit jurisdiction. Addition to the list of land uses that may be allowed with a Minor Special Use Permit shall require a Local Coastal Program amendment.

PART IV. FINDINGS FOR APPROVAL OF THE LAND USE PLAN AMENDMENT, AS SUBMITTED

A. AMENDMENT DESCRIPTION

The City of Coronado proposes to modify two existing Land Use Plan Action Goals (H10 and I8) to incorporate new policies on landscaping and parking standards. Also proposed is a revision to the Land Use Plan Map to delete the "Civic Use/Open Space" designation which is currently applied to all public lands and redesignate each individual site as either "Civic Use" or "Open Space," depending on the existing, historic or planned uses on each site. These revisions comprise Parts A, B, C and D of the amendment request.

Part A would add a new subsection, "W," to Action Goal I8, the LUP's list of parking standards. It would provide new parking standards for mixed-use developments, allowing reduced parking for the residential components of such mixed-use projects when they incorporate either senior/low income housing or housing for managers/employees of the on-site commercial component.

Specifically, for Part B, LUP Action Goal H10 currently provides, in part "that a minimum of 35 percent of new residential developments and 15 percent of new commercial developments ... shall be landscaped." The City no longer finds it appropriate to apply a single standard to every residential or commercial project, regardless of zone, density or other distinguishing factors. Moreover, the City believes this standard acts as a disincentive for redevelopment, and would be particularly discouraging for anyone trying to build an affordable housing project. Since the standards exceed those applied in many other coastal communities, the City is proposing to delete the quoted language and replace it with a new table, delineating different landscaping standards on a zone by zone basis. The proposed criteria will continue to require 35 percent landscaping in most residential zones, but will relax the standard to 25 percent in the R-3 and R-4 multi-family zoned areas. Likewise, most non-residential zones will continue to require 15 percent landscaping, but the standard is relaxed to 5 percent for the Central Commercial, Limited Commercial and Hotel-Motel Zones, which are located along the main corridors of the City, and reflect more of a strip commercial nature. For the OS and CR Zones, the requirement for 35 percent landscaping for residential uses is removed, and language requiring 15 percent landscaping for commercial uses is changed to 15 percent of the total site. In the CU Zone, the residential requirement is reduced from 35 percent to 25 percent, with 15 percent landscaping required for all non-residential uses.

Part C, the proposed amendment to Action Goal I8, would add three new subsections, "T" "U" and "V" to the LUP's listing of off-street parking requirements. These subsections address the required amount of off-street parking for schools and classrooms, drive-up windows, and parking lots or structures. The actual standards were reviewed and approved by the Coastal Commission in 1988 as an amendment to the certified implementing ordinances, but making a comparable change in the LUP was overlooked at the time. This amendment will reconcile the two documents by including an identical list of parking standards in both.

Finally, although the City has two separate zones to describe public properties (a Civic Use Zone and an Open Space Zone), the Land Use Plan Map has delineated all such sites with the dual designation of "Civic Use/Open Space." This dual designation fails to properly identify the City's many public or semi-public facilities, which can be more accurately described as either Civic Use or Open Space, but not both. Thus, Part D of the amendment includes a description (list) of all existing public and semi-public properties and separates them into "Civic Use" or "Open Space" depending on their existing, or in the case of a couple vacant parcels, their anticipated long-term uses.

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 THE PROPOSED LAND USE PLAN AMENDMENTS WITH CHAPTER 3 POLICIES OF THE COASTAL ACT.

The proposed LUP amendments would modify two existing action goals in the LUP and the Land Use Plan Map itself to reflect changes in the landscaping and parking standards and revise the "Civic Use" and "Open Space" land use designations on a number of sites. Chapter 3 policies of the Coastal Act most applicable to the subject amendment requests include, in part:

Section 30251

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. . . .

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 ...

The City has proposed new parking standards to encourage the development of mixed-use and affordable housing projects within the City. For regular mixed-use developments, the City is merely requiring a sum of parking needed for each individual use on the site, including two parking spaces per dwelling. However, where there is an affordable or senior housing component included in the mixed-use project, the City proposes reducing the parking standard for the residential component to only one parking space per dwelling or per two habitable units (as in boarding houses or single-room-occupancy hotels). The City also proposes a reduced standard where on-site housing is provided for managers or employees of the commercial component.

The City has provided documentation in the form of parking studies, case histories and standards applied in other jurisdictions to support their contention that fewer cars are owned by low-income and senior households, thereby requiring fewer parking spaces. The studies indicate that three-fourths of lower-income households own only one car or no cars, and also made significantly fewer trips than medium and high-income households. Likewise, senior households own an average of approximately 20% fewer cars, based on a recent SANDAG survey. Case histories of two existing elderly housing projects in the City of San Diego indicate that only approximately 20 parking spaces are required for a 153-unit downtown development, and that 63 spaces are more than adequate for a 92-unit project in a relatively high-density area northeast of downtown. Finally, a partial listing of standards applied in other municipalities for senior housing showed a broad range of standards, with the most restrictive requiring an average of one to 1.5 spaces per unit. By comparison, Coronado's proposal would be roughly equivalent to the standards applied in many other communities.

It should be noted, however, that many of the communities included in these surveys are inland locations, and are not beach-visitor destination points like the City of Coronado. The Commission's primary concern is that reduced on-site parking standards not result in a spillover effect onto nearby public parking areas utilized by beach visitors. The Commission concurs with the obvious logic that no adverse parking impacts will occur as a result of a

reduced parking standard for those projects that include housing for managers/employees of on-site commercial development. Furthermore, based on the submitted studies, standards, etc., the Commission finds a reasonable argument can be made for reducing parking standards for senior and low-income households.

An additional consideration is that the reduced standards only apply to a mixed-use development, such that a totally residential project could not be developed utilizing the lower standard. Existing City code requires that the ground floor of mixed-use projects be devoted to commercial uses and minimal parking, and said commercial uses must provide 100% of their required parking. Thus, projects designed with the herein-approved parking standards will not significantly reduce the total amount of parking required by the overall development. Moreover, the areas of Coronado where such development would be most likely to occur are removed from the immediate shoreline, in the existing commercial zones along the major transit corridor of Orange Avenue. Therefore, the Commission finds that the proposed parking standards for mixed-use developments can be found consistent with Section 30252 of the Coastal Act.

Visual resources are particularly significant in Coronado, where the entire "island" is considered a major visitor destination point. The single-family residential areas of the City present a parklike appearance, and are popular for passive recreation (i.e., strolling). No change to the landscaping standards is proposed for these single-family areas. The multi-family areas, however, are located along the major commercial and access corridors, and present a different type of visual amenity. Modified standards are proposed for these uses, as well as for the major commercial zones, which are located along the same transportation routes. These corridors, which include a mixture of residential, commercial and civic uses, are also popular areas for visitors, but are designed for more intense use and minimal street setbacks in deference to their pedestrian orientation. Thus, less area is available for streetside landscaping, and required landscape features are often located in side or rear yards, offering little visual benefit to the public and potentially affecting on-site development options.

The proposed landscaping standards (Part B of the amendment request) for multi-family residential and commercial developments are similar to those applied in nearby coastal communities, particularly the more populous beach areas of the City of San Diego, such as Pacific Beach, Mission Beach and Ocean Beach. The Commission has certified such standards as being consistent with the Coastal Act mandate to protect scenic coastal areas and assure compatibility of new and existing development. Likewise, the Commission finds that the application of the proposed standards in the community of Coronado will have no detrimental effects on the visual character of the community and is thus consistent with Section 30251 of the Coastal Act.

The three additions to the LUP list of parking standards, Part C of the subject amendment request, are proposed to bring the LUP and Implementation Ordinances into conformance. Several years ago (1988), the Commission adopted these standards in the Off-Street Parking Zone, as an amendment to the City's

LCP. The fact that the same list of parking standards was not included in the LUP was overlooked at that point, but the standards themselves were found consistent with Section 30252 of the Act, requiring, among other things, the provision of adequate parking in new development. The inclusion of this LCP amendment request is just to reconcile the two documents, and make sure the same list of standards is found in both LCP elements. Therefore, the Commission finds the addition of parking standards for schools and classrooms, drive-up facilities and parking lots and structures consistent with the applicable Chapter 3 policies.

The final LUP amendment (Part D of the amendment request) concerns the redesignation of the public and semi-public properties in Coronado. Currently, all such properties are designated as "Civic Use/Open Space" on the LUP map. By separating the sites according to existing and planned uses and redesignating them either "Civic Use" or "Open Space," the LUP map will more accurately reflect the current and long-term uses of these areas. Developed sites, such as schools, fire stations, the police station, libraries, etc will be designated as Civic Use, and existing parks and natural areas will be designated Open Space. There is no change in the underlying descriptions of these land uses. A listing of all sites and their new designations is included in the attached resolutions. The Commission finds that redesignating these properties does not change any underlying uses or intensity of uses, and has no effect on public access throughout the City. Thus, the proposed map modifications are fully consistent with Chapter 3 of the Coastal Act.

PART V. FINDINGS FOR APPROVAL OF A PORTION OF THE IMPLEMENTATION PLAN AMENDMENT, AS SUBMITTED.

A. AMENDMENT DESCRIPTION.

The proposed implementing ordinance amendments include an expansion of the existing decal parking program (Part E of the amendment request) to include an approximately six-block distance from the First and Fourth Street gates to the Naval Air Station North Island (NASNI). Also proposed are new landscaping standards for the CC, LC, HM, PCD, OS, CR, CU, R-4 and R-3 Zones (Part B of the amendment request), the addition of parking standards for mixed-use developments to the Off-Street Parking Ordinance (Part A of the amendment request), and an amendment to Section 86.36.040, a portion of the City's Coastal Development Permit Ordinance (Part F of the amendment request), to further clarify when coastal permits are required.

Only Parts A (mixed-use parking standards) and B (landscaping) are addressed in this finding, since the other Implementation Plan items are recommended for denial, as submitted (Parts E and F). Consistent with the new landscaping criteria shown in the table being approved for the LUP, the proposed amendments to the CC, LC, HM, PCD, R-4 and R-3 Zones will include the new landscaping standards of 25 percent in the two residential zones (R-4 and R-3) and 5 percent in the non-residential zones (CC, LC, HM and PCD Zones).

The general purpose and intent of these zones is to regulate most of the multi-family residential development and nearly all the commercial development

within Coronado. They provide a wide range of allowed uses and development standards, including the requirement to provide landscaping in conjunction with other improvements on each property. The proposed zoning changes simply incorporate the appropriate percentage of landscape coverage, based on the LUP table addressed previously. Thus, the various cited zones will be consistent with and able to carry out the provisions of the LUP, as amended herein.

With respect to the mixed-use parking standards, the language proposed to be added to the implementing ordinances is identical to that approved herein for the land use plan. The same table of parking standards appears in both components of the certified LCP. Thus, the modified implementing ordinances are consistent with and adequate to carry out the LUP, as modified herein.

PART VI. FINDINGS FOR DENIAL OF PORTIONS OF THE IMPLEMENTATION PLAN AMENDMENT, AS SUBMITTED - DECAL PARKING/CDP EXCLUSIONS

A. AMENDMENT DESCRIPTION.

The City of Coronado has proposed revised ordinance sections to accommodate an expansion of the existing decal parking program and to modify/clarify when coastal development permits are required. These two amendment requests (Parts E and F respectively) will be addressed separately below.

1. Decal Parking Program

a) Purpose and Intent of the Ordinance. Section 56.070.030 of the Municipal Code established permit parking regulations for the City. Its purpose is to assure that existing on-street parking within the City's residential zones near Naval Air Station, North Island remains available as a parking reservoir for the City's residents.

b) Major Provisions of the Ordinance. The ordinance establishes parameters for decal parking, including provisions that the permit parking program not interfere with commercial activities or public access to the shoreline and recreational areas. The program, which is implemented on weekdays, requires vehicles to display a parking decal in order to park on public streets within the delineated area.

c) Adequacy of the Ordinance to Implement the Certified Land Use Plan. The expansion of the decal parking zone area would include a new exhibit (Exhibit "A") in Section 56.070.030 of the Coronado Municipal Code to delineate the new boundaries. The text of the ordinance is not changed, but the physical boundaries have been expanded to roughly double the size of the decal parking zone. When the Commission certified the existing decal parking program in 1991, the then-proposed LUP language (Policy A6) was modified to read:

On-street parking may be regulated in a manner to safeguard the residential character of neighborhoods, to assure that a public nuisance is not created, and to preserve the sensitive natural environment of beach

and shoreline areas, provided that such regulation does not result in any diminution of existing public parking available at present or future bayfront or oceanfront access points and public recreation areas.

For the most part, the expanded area avoids conflicts with public access concerns, since most of the proposed restricted area is well away from the shoreline. However, the zone is proposed to be expanded for an additional three blocks along First Street, which includes several small parks and direct access to the San Diego Bay shoreline. The existing decal program includes the 300, 400, 500, and 600 blocks of First Street, with the exception of a one-block area adjacent to the "I" Avenue park. The exception covers half a block on either side of this very small park, which contains some seating and a viewpoint on the Bay. In this area, the City has regulated the time for parking, but does not require that decals be displayed. Thus, the Naval Station workers are discouraged from parking there, but park visitors are accommodated.

The proposed area of expansion along First Street includes the 700, 800 and 900 blocks; the 700 block is not a concern, since it is not adjacent to any public recreational areas. However, there is an existing park/viewpoint at the foot of "E" Avenue, known as Harbor View Park (or the SDG&E park). Park amenities include benches and a viewpoint, and there is a narrow (6' wide) public access path with stairs to the beach nearby to the west. The park and access path are between the 800 and 900 blocks of First Street, which would provide the most convenient place for a visitor to park and enjoy the public amenities or use the access path. Expansion of the decal parking program into this area may not be consistent with the mandates of the certified LUP to not diminish existing public access opportunities to bayfront access points.

There is a public parking lot at the foot of "D" Avenue, which provides 66 parking spaces and direct access to sandy beach. The City maintains that this parking lot is underutilized year round, and is more than sufficient for the needs of visitors to both the Harbor View Park and Centennial Park (a larger park at the foot of Orange Avenue at the site of the old Ferry Landing). Centennial Park is one block beyond the limits of the decal parking expansion area, as currently proposed. The parking lot is located roughly halfway between the two parks, but is the only off-street public parking available until one reaches the new ferry landing complex several blocks to the east. The Commission is concerned that this parking lot alone may not be adequate in the future as regional populations continue to grow at a rapid pace, and recreational sites (even small parks like Harbor View) become increasingly important and rare. Also of concern is that, as Naval Station workers are pushed further along First Street by the expansion of the decal parking program, they will ultimately usurp existing public parking spaces needed to serve the more heavily utilized recreational amenities to the east (the new ferry landing complex of shops, restaurants, docks, and sandy beach). Thus, the Commission finds that the permanent inclusion of the 800 and 900 blocks of First Avenue in the decal parking program, could, in the future, be inconsistent with, and inadequate to carry out, the certified LUP and that these two blocks should not be permanently precluded from public use.

2. Coastal Development Permits

a) Purpose and Intent of the Ordinance. The ordinance sets out the parameters for obtaining coastal development permits from the City and recognizes the various permit jurisdictions.

b) Major Provisions of the Ordinance. The ordinance includes a listing of exemptions from permit requirements, establishes criteria for permit applications and processing, and addresses appeals, amendments and the expiration of City-issued permits.

c) Adequacy of the Ordinance to Implement the Certified Land Use Plan. The proposed amendment to this ordinance would modify Subsection 86.70.060"A" to further reduce the requirements for City-issued coastal development permits. Permits are now required only when there is a requirement for some other form of local discretionary action, such as a variance or special use permit. The previously-certified ordinance language reads:

Those uses or activities permitted for a particular zone by the Coronado Municipal Code which do not require a discretionary action on the part of the City (i.e., planning commission or city council interpretation, or issuance of a special use permit or a variance) shall be exempt in that zone from the City coastal permit process for those areas that are neither under the California Coastal Commission appeal authority nor within the Coastal Commission's direct permit jurisdiction.

The City proposes to modify the language as follows (see passages underlined):

Those uses or activities permitted for a particular zone by the Coronado Municipal Code which do not require a discretionary action on the part of the City (i.e., Planning Commission or City Council interpretation, issuance of a Major Special Use Permit, or issuance of a variance to either the regulation of the amount of landscaping required or to any standard in Chapters 86.58, 86.64, 86.70, 86.72, 86.74, 86.76) shall be exempt in that zone from the City Coastal Permit process for those areas that are neither under the California Coastal Commission appeal authority nor within the Coastal Commission's direct permit jurisdiction.

The proposed implementation amendment request has been proposed to allow for additional exemptions from permit requirements in addition to the previously allowed broad range of categorical exemptions in the presently certified LCP. This municipal code revision poses a problem and is particularly difficult in light of the LCP structure originally certified by the Commission several years ago. The City of Coronado LCP is unique in that it has set up specifically defined geographic areas where virtually all development is exempt from the coastal permit process. In effect, a section of their ordinance functions as a broad exclusion from permit requirements for virtually all development outside the appeals area; the City refers to these exclusions as "categorical exemptions". Only projects requiring a special use permit, a variance or a "council interpretation" require coastal development permits.

The City maintains that the proposed language cites all City ordinances which are part of the certified LCP. Commission staff maintains that the list of ordinances given in the proposed text is not complete. At least two other ordinances are part of the LCP Implementation Program, Sections. 86.20 and 86.60, along with several definitions listed in the Code (86.02, 86.04 and 86.54 for instance). However, this difference of opinion of what constitutes the certified LCP will be addressed outside the context of this particular LCP amendment, since it covers a broader planning issue, which City and Commission staff are working to resolve. Resolution of this issue may result in future amendments to update the language of the certified LCP.

The other potential problem with the proposed amendment request is that the Special Use Permit Ordinance, within which the City classifies proposals as either "minor" or "major" is not part of the certified LCP. Thus, any future changes to that ordinance, including the designation of currently "major" proposals as "minor" would not be subject to Commission review as presently interpreted by the City. Currently, the only projects requiring the Minor Special Use Permit are antenna masts and antenna towers; all other development not allowed by right in the underlying zone, requires a Major Special Use Permit. The Commission finds that approval of antennas outside of the appeals jurisdiction, if exempted from coastal development permit requirements, will not result in adverse impacts to coastal resources, due to the urbanized nature of the City of Coronado and the relatively insignificant scope of such a development.

Of greater concern to the Commission is that the City could, in the future, change the classification of many other types of development from "Major" to "Minor." In this way, coastal development permits would not be required for the identified development types. However, the Commission would not have any review authority over the reclassification process since the Special Use Permits Ordinance is not part of the certified LCP. Thus, the City could modify the Special Use Permit regulations, without Commission review, and also create additional exclusions without discrete Coastal Commission endorsement.

Within the City of Coronado, there may be justification for excluding or exempting many types of development, including some development requiring other forms of discretionary review, such as a Special Use Permit. The majority of the City is fully developed with urban-type uses, and there are virtually no sensitive resources located in those areas that are not subject to Commission appeals. However, the test of implementation program amendments is their conformity with and their ability to carry out the policies of the certified LUP. The proposed amendment would have exempted new development without any specification, and it would be impossible to make the necessary findings that such future development would conform with the certified land use plan and protect coastal resources. The Commission finds that the proposed amendment, which relies on discretionary City policies and reviews which are not part of the LCP, is neither consistent with nor adequate to carry out the resource protection policies of the certified LUP.

PART VII. FINDINGS FOR APPROVAL OF THE IMPLEMENTATION PLAN AMENDMENTS
ADDRESSING EXPANSION OF THE DECAL PARKING PROGRAM AND COASTAL
DEVELOPMENT PERMITS, IF MODIFIED.

1. Decal Parking Program

The Commission finds the currently proposed ordinance revisions can only be approved if modified to be consistent with the certified land use plan language, which maintains that the decal program shall not result in the diminution of existing public parking at bayfront access points. The Commission understands that the City is trying to discourage use of the City streets by workers from the Naval Air Station, North Island, who regularly park along the streets to avoid taking their cars onto the military base. The Commission further concurs with the City's position that there is not a current public parking shortfall, since site inspections have proven that the existing 66-space public parking lot and the adjacent streets are not fully utilized even on summer weekends at this time.

However, the concern of the Commission's is that future regional growth will result in increased demand for parking in all nearshore areas, such that the time may come when the 66-space parking lot alone cannot accommodate all visitors to Coronado's bayfront amenities. The Commission finds that permanently precluding the public from parking on the nearby streets could prove unwise in future years, and could result in the diminution of public access opportunities as mandated in the certified land use plan. Moreover, the City of Coronado has indicated that it is currently negotiating with the Navy to try and resolve the issue of Navy and civilian workers parking on the City's residential streets. Increased parking is proposed on the North Island Naval Air Station itself, partly in conjunction with the homeporting project which is anticipated to be completed in a few years.

Thus, Suggested Modification #1 has been adopted to make the expanded decal parking program in this critical two-block area temporary for the next five years. At the end of that period, the City may request an extension of time if there is no evidence that public demand for parking in the bayfront area has significantly increased, and if negotiations with the Navy have not eliminated the need for the program altogether. The modification requires the City to monitor use of the D Avenue parking lot and adjacent streets during the summer months, with parking counts taken on at least two Saturdays or Sundays a month, during mid-day hours, between Memorial Day and Labor Day each year. With the suggested modification limiting the program to five years without further Commission review, the Commission finds the proposed expansion of the decal parking program consistent with, and able to carry out, the certified land use plan.

2. Coastal Development Permits

The Commission finds the currently proposed ordinance revisions can only be approved if modified as suggested herein. At present, any project requiring a Special Use Permit also requires a coastal development permit. The City's process includes both Minor and Major Special Use Permits, but both currently

require a coastal development permit as an additional discretionary review. Under the City's proposed revision, projects requiring a Minor Special Use Permit would no longer be required to go through the coastal development permit process. Since the Special Use Permit ordinance is not part of the certified LCP, additional types of projects could be classified as only requiring Minor Special Use Permits, and thus be exempted from coastal development permit review without any action by the Coastal Commission.

However, adopted Suggested Modification #2 requires that future additions to the list of projects requiring only a Minor Special Use Permit be reviewed by the Commission through the LCP amendment process. In this way, the Commission will have the ability to determine whether such projects are consistent with the fully-developed character of Coronado and assure that exemption from the coastal development permit process will not result in adverse impacts to any coastal resources. Thus, with the suggested modification, the Commission finds the proposed ordinance revision consistent with, and adequate to carry out, the resource protection policies of the certified LUP.

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, some portions as submitted and others with suggested modifications, would not result in significant environmental impacts under the meaning of the California Environmental Quality Act. For example, the various approved portions of the LCP amendment would not limit the public's ability to gain access to the City's shoreline, due to the suggested modification addressing decal parking along First Street, nor result in adverse impacts to visual resources and community character. Also, exempting projects requiring Minor Special Use Permits from the coastal development permit process would not have adverse impacts, as modified herein, since the Commission retains the right of review over additions to the list of such projects. Therefore, the Commission finds that no significant, unmitigable environmental impacts under the meaning of CEQA will result from the approval of the proposed amendments, as submitted by the City of Coronado and subsequently modified herein.

(1294A)