

**CALIFORNIA COASTAL COMMISSION**

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# W16a

## ADDENDUM

**May 9, 2023**

**To:** Commissioners and Interested Persons

**From:** California Coastal Commission  
San Diego Staff

**Subject:** Addendum to **Item W16a, Del Mar LCP Amendment No. LCP-6-DMR-21-0081-2 (Parking Adjustments)**, for the Commission Meeting of May 10 - 12, 2023

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The purpose of this addendum is to make minor corrections and revisions to the staff report and to respond to public comment. Staff recommends the following changes be made to the above-referenced staff report. Deletions shall be marked by ~~strikethrough~~ and additions shall be underlined:

1. On Page 18 of the staff report, a new paragraph shall be added after the second sentence as follows:

After publication of the staff report, a letter from a member of the public was received (as posted in [Correspondence](#)). The letter asserts that the Suggested Modifications as currently written do not address how maintaining a public parking supply in Del Mar incentivizes beachgoers to drive to the beach in the first place, resulting in the perpetuation of vehicle-dependent travel and discouraging the growth of alternative transportation. The letter also contains several proposed revisions to the Suggested Modifications, including revisions to the LUP policies above, to include additional suggestions on parking programs and alternatives, as well as tying new development in general more closely to the development and extension of transit services.

The Suggested Modifications described above explicitly require consideration of alternative transportation and the reduction of land devoted to parking while ensuring that access to the coast is not reduced. It is expected that the use of alternative transportation will continue to grow in the coming years, albeit in some cases slowly depending on local factors, but the Commission has repeatedly shown its support and encouragement for such trends. One recent example includes the North Coast Highway 101 Streetscape Project in Encinitas (LCP-6-ENC-18-0034-1), which included the removal of parking while increasing

pedestrian and cycling amenities, and the project also requires development to target equity among all modes of travel, including public transportation. Similarly, CDP No. 5-18-0767 required the removal of approx. 700 parking spaces and its replacement with a recreational field, public amenities, bike stalls, and pedestrian improvements. The Commission also routinely requires or accepts transportation demand management programs for small businesses (for example, in Southern California, see CDP Nos. A-5-VEN-21-0011, 6-12-061, 5-18-1148, 5-17-0539, 5-20-0598, 6-21-0259, and 5-21-0090). These TDMs commonly emphasize requirements or incentives to increase the use of alternative transit and ridesharing programs, bike racks, on-site showers, etc.

In approving these projects, the Commission has signaled its interest and intent in continuing to provide for alternative transportation to the coast when feasible. However, inherent to these efforts is the fact that public transportation to the shoreline is not readily accessible or feasible for many people who do not live within direct vicinity of the coast. For example, for residents of inland communities, driving to the coast may perhaps be the only or best option available – transportation by bus, train, etc. may be extremely time-consuming and inconvenient. If not for their vehicles, many people may not choose to visit the beach at all given the difficulties in reaching it. This presents a concern from an equity standpoint. While the threat of climate change and greenhouse gas emissions must be addressed, the reality remains that the alternative transportation needed for all Californians to access the coast is not yet in place, and existing infrastructure is currently most amenable to automobiles. The Suggested Modifications aim to strike a balanced approach to public access to the coast, given the reality of how most people still travel, and the need to incentivize the extension and use of alternative transportation.

The offered changes to the Suggested Modifications are largely supplemental suggestions that do not change the underlying intent of the policies or encourage the use of parking management strategies or alternative transportation any more than what the current language does. One suggested change would delete the reference to the need for development to provide parking in accordance with the City's certified Implementation Plan and replace it with language emphasizing the need for new development to be sited as appropriate to facilitate the extension of transit services, minimizing the use of coastal access roads, providing for nonautomobile circulation within development, and for providing adequate parking facilities or providing substitute means of serving the development with public transportation. The language of this suggested change is consistent with Coastal Act section 30252; however, several existing policies of the LUP as well as the Suggested Modifications of this amendment proposal are also consistent with Coastal Act section 30252. The reference to the parking standards of the IP simply requires conformance between the documents and allows for appropriate parking as determined by the City.

2. On Page 21 of the staff report, the third paragraph shall be revised as follows:

Nevertheless, all of the areas affected are within walking distance of the beach or the public trails adjacent to the river. The change in the parking ratio from one space per 90 square feet to one space per 200 square feet is a significant impact that may result in greater use of street parking and public parking that would otherwise be utilized for beach access. This is especially true in the Beach Commercial (BC) zone, where three of the largest restaurants in the City are located (Poseidon at 1670 Coast Boulevard, Brigantine at 3263 Camino del Mar, and Jake's at 1670 Coast Boulevard), all of which currently utilize valet parking to try to meet the demand for parking. This area has extremely high beach use, and vehicle circulation is often impacted by people attempting to find beach parking. Two of these restaurants are 5,000 square feet or more, and as proposed, the excess indoor area over 5,000 sq. ft. would be required to have parking at a ratio of only one space per 90 sq. ft. The current LCP has a lower threshold of indoor and outdoor space in excess of 4,000 sq. ft. requiring parking at a rate of one space per 45 sq. ft. The exemption for outdoor space would further allow for the expansion of outdoor seating areas either without requiring any additional off-street parking or at the proposed parking rate (depending upon the size of the outdoor space). The City has expressed the amendment is not intended to accommodate flexibility for reduced parking on these sites specifically, as the restaurants within the Beach Commercial Zone already have conditional use permits in place for valet parking, and any proposed redevelopment or modification to these programs would be subject to discretionary review and likely require a CDP. ~~Nonetheless, For the restaurants in the Beach Commercial Zone, with there are in direct proximity to coastal access points, where any increase in spillover parking is likely to have a significant impact on public access.~~

3. On Page 24 of the staff report, the last sentence of the first paragraph shall be revised as follows:

Additionally, as part of a recent CDP approval No. 6-22-0078, the City implements an ongoing paid parking program for 308 parking spaces ~~and intends to remove~~ and has recently removed the existing paid parking for 114 spaces along the southern side of Via de la Valle, ~~making a total of approximately 694 free spaces City-wide.~~ Additionally, several thousand free on-street parking spaces are found throughout the City of Del Mar, including beach parking and downtown parking along Camino del Mar.

4. On page 27 of the staff report, the second full paragraph shall be revised as follows:

Additionally, the City proposes to reduce parking requirements for restaurants City-wide, including in the Beach Commercial Zone. As was noted above, three of the largest restaurants in the City are located in the Beach Commercial Zone. While the parking requirements would not apply to these three restaurants at this time because they all have valet parking programs approved by the City and which would require a discretionary action and potentially a CDP to modify, there

is a possibility that their parking programs will be discontinued in the future or a new restaurant may be established in their place or on another Beach Commercial parcel. In that case, there is a concern that the reduced parking requirements would result in patrons of the restaurant using nearby beach parking. This spillover effect would only be exacerbated if the exemption for outdoor dining space was also utilized. Because of this concern, **Suggested Modification #9** excludes the Beach Commercial Zone from the proposed parking rate changes to indoor areas of restaurants and **Suggested Modification #11** excludes the Beach Commercial Zone from the City's proposed parking rate changes to outdoor areas of restaurants. **Suggested Modification #11** includes the same deadline of January 1, 2031 to the City's proposed changes for outdoor areas for restaurants in the hope that recommendations from the PMP will inform an amendment prior to the expiration date (or that may otherwise be extended by the Executive Director).

5. On Page 28 of the staff report, a new paragraph shall be added after the first full sentence of the page as follows:

As described earlier, a letter from a member of the public was received after publication of the staff report. In addition to the revisions suggested in the LUP section above, the letter also asserts that Suggested Modifications #7-11 should be deleted because their focus is maintaining an abundant parking supply and perpetuating existing transportation patterns that are inconsistent with the state's climate goals and the Coastal Act. The goal of the PMP is to better understand the evolving nature of parking requirements in the City, including this amendment, and to ensure that public access to the coast is not being adversely affected. The PMP is not intended to perpetuate the existing parking regime or impede the further implementation of public transit, but rather to give City and Commission staff important data to be used as parking needs and requirements inevitably change and alternative transportation continues to be expanded and used. The City completed a base parking ratio comparison for the amendment but has otherwise not completed a more comprehensive overview of their parking strategies and recommendations since a 2015 report focused on the downtown area. Meanwhile, an existing LUP policy requires the completion and regular update of a parking inventory City-wide. The implementation of this policy is no doubt an undertaking for the City, but the geographic area for which data must be collected has been limited to within one-quarter mile of the coast and along the San Dieguito River. This will allow the City to focus its data collection only in that area most critical to public access.

Finally, as has been noted previously, public transportation to the coast is not feasible for many people. Where it exists, it may be inconvenient and time-consuming, especially for families and residents of more inland communities. Understanding the parking needs of the City and the resulting recommendations of the PMP (which must take into account factors such as environmental justice and alternatives to private automobile use) will ensure that the coast remains a

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destination for all members of the public and not only those fortunate enough to be able to walk, bike, or take a commuter bus to the shoreline.