

CALIFORNIA COASTAL COMMISSION

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Th20a

ADDENDUM

August 8, 2023

To: Commissioners and Interested Persons

From: California Coastal Commission
San Diego Staff

Subject: Addendum to **Item Th20a**, Coastal Commission Permit Application **#A-6-DMR-23-0022 (Vonder Reith ADU)**, for the Commission Meeting of August 10, 2023

The purpose of this addendum is to revise the findings concerning non-conforming parking on-site due to new information submitted by the City after publication of the staff report, as well as clarify how public views are considered separately from setbacks. 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 3, the first paragraph shall be revised as follows:

The project also raises a substantial issue concerning parking and public access. ~~Four parking spaces are required for this site.~~ Existing parking for the duplex includes a 2-car garage on the northern side of the property and an approximately 44-foot by 18-foot gravel parking pad on the southwestern side of the property. The gravel parking pad contains one legal parking space that meets the minimum size requirements of the City's LCP, ~~making the site existing non-conforming, as four legal parking spaces total are required for the site, and only three legal spaces exist~~ After publication of the staff report, the City notified Commission staff that the current site meets all parking requirements of the Implementation Plan (IP) with its three legal parking spaces for the three existing bedrooms, but unfortunately the approved plans have inconsistencies regarding the number of bedroom units on the site. The applicant asserts that only two spaces are required for the site (see [Correspondence](#)). Thus, although the ADU will not require new parking, as explained on p. 11 of the staff report, the amount of parking required for the existing site with the proposal is not clear. Additionally, the legal availability of the gravel area for providing adequate parking is not clear at this time. The applicant has ~~also~~ added that the space is large enough to accommodate two to four cars depending on the size and

configuration of vehicles, and taking into account area of the gravel pad located outside the parcel boundaries and within the City's right-of-way. However, because the proposed ADU would be constructed south of the existing residence, the project raises concerns that the gravel parking area would be reduced in size and potentially reduce the area available for onsite parking, ~~inconsistent with the City's LCP.~~ Based on the information available, it is unclear how many additional parking spaces the gravel area will accommodate after construction of the ADU and whether the amount of onsite parking will be adequate overall, ~~and it is not clear if the approved project will exacerbate the degree of non-conformity of the site.~~ When private residential parking needs are not accommodated onsite, it can lead to increased use of on-street parking and thereby reduce the availability of on-street parking to the general public. This could potentially affect public coastal access to the nearby Del Mar Upper Bluff Coastal Trail, for which an access point is located at the end of 6th street directly west of the subject site and that is identified within the certified LCP. Thus, the potential reduction in area available for onsite parking contributes to a finding of substantial issue and should be further explored at the de novo review.

2. On Page 9 of the staff report, the first paragraph shall be revised as follows:

The appellants contend that the project as approved by the City does not conform to the public view protection policies of the City's LCP as identified above. As stated in the relevant policies, the Del Mar certified LUP does not identify specific viewpoints or street ends but requires the preservation of "public vantage points." Importantly, the LCP does not protect private views of the ocean from neighboring residences in this area.

3. On Page 9 of the staff report, the second paragraph shall be revised as follows:

The subject site is the most seaward residential lot at the terminus of 6th Street. As noted, 6th Street is a highly scenic public view corridor with ocean views available from Stratford Court down 6th Street. Public parking is also available on 6th Street. The proposed ADU would be located on the southern portion of the site, set back approximately 20 feet from 6th Street, consistent with the underlying zoning. The new ADU would extend approximately 10 feet closer to 6th Street compared to the existing residence. While the new ADU will comply with the 20-foot front yard setback of the underlying zone, preservation of public views is a separate consideration. The proposal must be consistent with the public view protections in the City's LCP.

4. On Page 11 of the staff report, the second paragraph shall be revised as follows:

The proposed ADU is located on a parcel with an existing duplex. Existing parking for the residences includes a 2-car garage on the northern side of the property and an approximately 44-foot by 18-foot gravel parking pad on the southwestern side of the property. The gravel parking pad contains one legal parking space that meets the minimum size requirements of the City's LCP, but

aerial imagery of the site and photos from the applicant indicate that the gravel area accommodates more than one car ([Exhibit 7](#)). The applicant has also stated that the space is large enough to accommodate two to four cars depending on the size and configuration of vehicles, and taking into account area of the gravel pad located outside the parcel boundaries and within the City's right-of-way. ~~Overall, the site is existing non-conforming in regards to parking, as four parking spaces total are required for the site, and only three legal spaces exist~~

5. On Page 11 of the staff report, a new paragraph shall be added after the third paragraph:

After publication of the staff report, the City notified Commission staff that the current site meets all parking requirements of the Implementation Plan (IP) with its three legal parking spaces for the three existing bedrooms, but unfortunately the approved plans have inconsistencies regarding the number of bedroom units on the site. The applicant continues to assert that the required parking for the site totals only two spaces. Thus, the amount of parking required for the existing site with the proposal is not clear.

6. On Page 11 of the staff report, the last paragraph shall be revised as follows:

~~However~~ Additionally, because the proposed ADU would be constructed south of the existing residence, the project does raise concerns that the gravel parking area would be reduced in size and potentially reduce the area available for onsite parking, ~~inconsistent with the City's LCP.~~ The plans approved by the City show that the one legal space will be maintained within the gravel parking area and the applicant contends that the gravel parking space will not be significantly reduced in size. However, based on the information available, it is unclear how many additional parking spaces the gravel area will accommodate after construction of the ADU and if existing on-site parking will be lost and it is not clear if the approved project will exacerbate the degree of non-conformity of the site. When private residential parking needs are not accommodated onsite, it can lead to increased use of on-street parking to address such needs, thereby reducing the availability of on-street parking to the general public. This may adversely affect public coastal access if it occurs in high visitor-serving areas and/or areas with significant public recreational access opportunities, and where on-street parking is heavily used, such as in Del Mar. The appellants allege that public access to the coast along the Del Mar Upper Bluff Coastal Trail will be affected by a loss of on-site parking. The coastal trail runs from 4th Street to 8th Street, and includes an access point at the street-end at 6th Street directly west of the subject site and that is identified within the certified LCP. Thus, the potential reduction in area available for onsite parking contributes to a finding of substantial issue and should be further explored at the de novo review.