

CALIFORNIA COASTAL COMMISSION

SAN DIEGO DISTRICT OFFICE
 7575 METROPOLITAN DRIVE, SUITE 103
 SAN DIEGO, CA 92108-4402
 (619) 767-2370
 EMAIL: SANDIEGOCOAST.CA.GOV

**W17c**

Filed: 3/20/26
 180th Day: 9/16/26
 Staff: A. Llerandi-SD
 Staff Report: 5/28/26
 Hearing Date: 6/10/26

STAFF REPORT: REGULAR CALENDAR

Application No.: 6-26-0202

Applicant: City of San Diego Dept. of Parks and Recreation

Agent: Cherlyn Cac

Location: Various public parking lots along the coast, University, La Jolla, Pacific Beach, Mission Beach, Mission Bay Park, Ocean Beach, Peninsula, San Diego, (San Diego County) APN(s): 340-011-09; 342-010-36; 346-161-03; 346-221-03; 351-263-01; 415-220-14; 423-360-26; 423-680-12; 423-750-01; 435-480-17; 448-010-17; 448-031-04; 448-034-01; 448-081-33; 448-142-15; 448-800-01; 530-780-01; 532-510-14; 760-030-07; 760-035-01; 760-103-41, 52; 760-217-18, 65, 74, 75, 76

Project Description: Revise existing and implement new parking restrictions including hours of operation, time limits, and installation of gates at various coastal public parking lots.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

The City of San Diego Department of Parks and Recreation is requesting a ten-year permit to revise vehicle parking restrictions at thirty-five public parking lots comprising approximately 9,255 off-street parking spaces the City manages. The restrictions include various nighttime vehicle closure hours, gates, and time limited parking. The

subject parking lots are located along the City's coastline from the community of La Jolla in the north down through the communities of Pacific Beach, Mission Beach, Mission Bay Park, Ocean Beach, and Peninsula to the south [[Exhibit 1](#)].

The City submitted extensive, site-specific documentation showing a steady rise in nighttime criminal activity at certain lots, including detailed police logs and staffing analyses. Public parking provides the primary means of shoreline access for many residents and visitors, particularly those who live inland and in lower-income communities, given limited feasible transit alternatives. Thus, Commission staff worked closely with City staff to reduce and tailor the proposed closure hours so that each lot is restricted only during the minimum hours necessary to address demonstrated safety problems.

As originally proposed by the City, parking closure hours would have ranged from 9 PM – 7 AM, with the exact hours of closure within that range depending on the particular parking lot. However, after coordinating with Commission staff, the duration of closure hours at several lots were reduced, with fifteen of the parking lots having closure hours of 2 – 4 AM, ten of the lots having closure hours of 12 – 4 AM, five of the lots having closure hours of 10 PM – 4 AM, and each of the remaining six lots having unique closure hours between 9 PM – 7 AM based on their specific circumstances [[Exhibit 3](#)]. The proposed project includes the installation of updated signage and the installation of new vehicular gates at seven parking lots, in addition to the sixteen parking lots that already have gates. New four-hour maximum parking durations will be implemented in two parking lots in the Ocean Beach community: Newport Avenue Pier and Santa Monica Avenue.

Several existing parking restrictions were implemented or retained without required coastal development permits, and some new restrictions were added without Commission review. To resolve these violations and offset access impacts from both the historic and proposed restrictions, Special Conditions require the City to implement a package of public access improvements, including new bicycle parking, expanded mobility mats, printed and digital wayfinding tools, and interpretive panels

In addition, **Special Condition #3** requires the City to implement a plan proposed by the City to partner with the La Jolla Coastal Conservancy to advance the repair and reopening of the South Casa Beach stairway [[Exhibit 9](#)]. This heavily used accessway has been closed since 2023–2024 storm damage. The condition requires the City to submit a detailed implementation plan, provide annual progress reports, and ensure the stairway is reopened within five years of Commission approval. If project milestones are not met and the stairway cannot be reopened within that five-year period, the City must apply for a permit amendment proposing alternative public access or recreation mitigation. Additional special conditions limit the permit to ten years for future reassessment, and clarify that the subject permit supersedes prior CDPs for various parking restrictions at these parking lots.

6-26-0202

City of San Diego Dept. of Parks and Rec

As conditioned, the project addresses documented safety concerns with the least amount of impact on public access, resolves unpermitted development, and provides mitigation for past impacts to access. Therefore, Commission staff recommends that the Commission **APPROVE** coastal development permit application 6-26-0202, as conditioned. The motion is on page 5 of the staff report. The standard of review is Chapter 3 of the Coastal Act and the City of San Diego's certified Local Coastal Program.

TABLE OF CONTENTS

I. MOTION AND RESOLUTION	5
II. STANDARD CONDITIONS	5
III. SPECIAL CONDITIONS.....	6
IV. FINDINGS AND DECLARATIONS.....	9
A. Project Description and Background.....	9
B. Public Access and Recreation.....	11
C. Unpermitted Development	19
D. Local Coastal Planning	21
E. California Environmental Quality Act.....	21

EXHIBITS

[Exhibit 1 – Overall Location Map](#)

[Exhibit 2 – Location Maps](#)

[Exhibit 3 – Proposed and Recommended Parking Restrictions](#)

[Exhibit 4 – Known Parking Lot Violations](#)

[Exhibit 5 - Sample Signs and Vehicular Gates](#)

[Exhibit 6 – Sample of Police Activity Reports](#)

[Exhibit 7 – City of San Diego Beach Bonfire Rules](#)

[Exhibit 8 – Sample of Public Access Improvements](#)

[Exhibit 9 – South Casa Beach Staircase Restoration Plan](#)

I. MOTION AND RESOLUTION

Motion:

I move that the Commission approve Coastal Development Permit 6-26-0202 pursuant to the staff recommendation.

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of Commissioners present.

Resolution:

The Commission hereby approves the Coastal Development Permit for the proposed project and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the applicant or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the applicant to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. Approved Parking Plan.

WITHIN 45 DAYS OF COMMISSION ACTION ON THIS COASTAL DEVELOPMENT PERMIT, the permittee shall submit for the review and approval of the Executive Director parking plans for the public parking lots covered by this permit that incorporate, at a minimum, the following:

- a. Plans for each parking lot that indicate the design, location, and content of parking signage that will reflect the approved parking restrictions contained in [Exhibit 3](#) attached to this permit, as well as the location of any approved vehicular gates and the manner they will be opened and closed as required by this permit.

The permittee shall undertake development in conformance with the approved final plan unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

2. Public Access Improvements

WITHIN 120 DAYS OF COMMISSION ACTION ON THIS COASTAL DEVELOPMENT PERMIT, the permittee shall implement the following public access enhancement measures:

- a. Install no fewer than eleven (11) bicycle parking facilities within Mission Bay Park at East Bonita, El Carmel, Sunset, Hospitality, South Shores, South De Anza, Playa III, Playa II, Playa I, Crown Point, and Vacation Island public park facilities.
- b. Add additional mobility mat areas at La Jolla Shores Lifeguard Stations, Pacific Beach Lifeguard Station, Mission Beach Lifeguard Station, South Mission Beach Lifeguard Station, Ocean Beach Lifeguard Station, Crown Point, Bonita Cove, Mission Point, and Fanuel Street Park to provide additional lateral access in addition to vertical access on the sandy beach.
- c. Create 8.5" x 11" maps of the City of San Diego's coastal park facilities to be distributed by Park Rangers and other public recreational organizations.
- d. Install map panels at Mission Beach Park and Mission Bay Park to display the various recreational amenities and their location to the public.
- e. Create an interactive map on the City of San Diego's website showing public access points, parking lots, and transit routes in the coastal parks that will also be accessible by a QR code placed on City signage, informational panels, and handouts.

- f. Install informational panels about tidal processes and coastal erosion at Sunset Cliffs Park.
- g. The Public Access Improvements described in this condition shall be designed to be multi-lingual, at a minimum English and Spanish, tailored to be culturally relevant, and written in plain language or designed using universal pictograms.

The permittee shall undertake development in conformance with the approved plan unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

3. South Casa Beach Staircase Repair Collaboration Program

WITHIN 45 DAYS of COMMISSION ACTION ON THIS CDP, the permittee shall submit for the review and approval of the Executive Director a final plan for the South Casa Staircase Repair in substantial conformance with the draft plan shown as [Exhibit 9](#). The program, which involves collaborating with the La Jolla Coastal Conservancy to repair the South Casa Staircase, shall include the following:

- a. A project timeline that demonstrates a projected opening date of no later than January 1, 2031;
- b. Agreement by the City to be a co-applicant on any Coastal Commission coastal development permit required for stairway project;
- c. Stairway project status reports submitted to the Executive Director annually commencing one year after the date of Commission approval of this permit describing progress toward meeting each milestone in the approved schedule;
- d. Agreement by the City that, if the annual status reports indicate, or the Executive Director determines, that any milestone in the approved project schedule will not be met within six months of its projected date, the permittee shall submit an application for a coastal development permit amendment to extend the deadline for completion of the stairway repairs unless the Executive Director determines that an amendment is not necessary and grants an extension for good cause. The permittee further agrees that if the status reports indicate or the Executive Director determines that project progress has materially stalled, the permittee shall apply for a coastal development permit amendment proposing alternative public access or public recreation mitigation.

The permittee shall undertake development in conformance with the approved plan unless the Commission amends this permit or the Executive Director provides a

written determination that no amendment is legally required for any proposed minor deviations.

4. Permit Duration.

This permit approval is valid for a period of ten (10) years from the date of Coastal Commission action on this permit. Any extension of time beyond ten years shall require a separate coastal development permit or an amendment to this permit. Any application to extend or to continue, renew, or modify the operational restrictions authorized under this permit, shall include documentation of any public complaints or public safety concerns associated with the use of the subject parking lots during the permit term, as well as a summary of the City's actions to address them through enforcement of applicable public safety, nuisance, or operational regulations.

5. Superseding Previous Coastal Development Permits.

This permit shall supersede the following Coastal Development Permits governing parking restrictions at the relevant parking lots covered by this permit:

- CDP No. 6-88-366
- CDP No. 6-88-545
- CDP No. 6-88-545-A
- CDP No. 6-89-359
- CDP No. A-6-LJS-90-161
- CDP No. 6-91-146
- CDP No. 6-91-146-A
- CDP No. 6-91-146-A2
- CDP No. 6-02-090
- CDP No. 6-02-090-A1

6. Issuance of Coastal Development Permit No. 6-26-0202

This Coastal Development Permit shall be deemed issued and vested upon formal approval by the California Coastal Commission.

IV. FINDINGS AND DECLARATIONS

A. Project Description and Background

Project Description

The City of San Diego Department of Parks and Recreation is requesting a ten-year permit to revise vehicle parking restrictions at thirty-five public parking lots comprising approximately 9,255 parking spaces the City manages along its coastline. The subject parking lots are located along the City's coastline from the community of La Jolla in the north down through the communities of Pacific Beach, Mission Beach, Mission Bay Park, Ocean Beach, and Peninsula to the south [[Exhibits 1 & 2](#)]. As originally proposed by the City, parking closure hours will range from 9 PM – 7 AM, with the exact hours of closure within that range depending on the particular parking lot. However, after several meetings between City and Coastal Commission staff to narrow the scope of the closures, the duration of closure hours at several lots were reduced, with fifteen of the parking lots having closure hours of 2 – 4 AM, ten of the lots having closure hours of 12 – 4 AM, five of the lots having closure hours of 10 PM – 4 AM, and each of the remaining six lots having unique closure hours between 9 PM – 7 AM based on their specific circumstances [[Exhibit 3](#)]. The proposed project includes the installation of signs at all parking lots indicating the closure hours for each parking lot, as well as installing vehicular gates at seven parking lots in addition to the sixteen parking lots that already have gates. City staff plan to close the security gates at each parking lot to enforce the closure. Additionally, new four-hour maximum parking durations will be implemented in two parking lots in the Ocean Beach community: Newport Avenue Pier and Santa Monica Avenue. It is important to note that overnight parking and vehicle habitation is already prohibited in the subject lots and this action will not change that restriction. The City will continue to enforce existing restrictions on overnight parking, camping, and vehicle habitation at the public lots. The City has existing housing and shelter resources for members of the public who require such assistance.¹

Background

The City of San Diego has approximately seventeen miles of coastline along the Pacific Ocean, Mission Bay, and San Diego Bay. This stretch of coast is interspersed with several public parking lots of various sizes and configurations to serve visitors, which due to the City's favorable weather and high tourism see substantial year-round use by both residents and visitors.

The public parking lots covered by this permit contain approximately 9,173 parking spaces comprising a mix of standard vehicle parking spaces, American with Disability Act (ADA) spaces, electric vehicle spaces, larger spaces that can accommodate towed boats and recreation vehicle, and spaces reserved for City employees such as park

¹ [Homelessness Strategies and Solutions | City of San Diego Official Website](#)

maintenance and lifeguard employees. These parking lots constitute a substantial percentage, but not all, of the public parking lots the City operates along its coast. Construction of the parking lots pre-dates the Coastal Act, as do several, but not all, of the existing parking restrictions at them. For many of the parking lots, the common parking restriction is nightly 2 – 4 AM closure to vehicles to discourage informal overnight “camping” and vehicle habitation in the parking lots. To date many of the City’s parking lots still maintain this minimal two-hour closure, but over the decades, issues of excessive noise and criminal activity, reported either by residents adjacent to the coastal parks or the San Diego Police Department, has led the City in the past to implement stricter parking restrictions on certain lots that experience higher volumes of the above activities.

Many of these parking restrictions took the form of installing vehicle gates and extending the hours during which the parking lot would be closed. Despite constituting development and adversely impacting public access, many of these extended parking restrictions were implemented without the benefit of a coastal development permit (CDP). Commission staff directed the City to apply for permits for any parking restrictions, and starting in 1988, the City of San Diego periodically obtained CDPs to modify parking restrictions at certain public parking lots along the coast.

The following is a history of the CDPs authorized by the Coastal Commission allowing the City to modify the parking restrictions at certain coastal parking lots. The majority of these CDPs are still in effect, though a small number have expired pursuant to their special conditions establishing a limited duration:

- CDP 6-88-366 approved the installation of a vehicular gate at the end of the paved road leading to Mariner’s Point in Mission Bay Park and authorized seasonal nighttime vehicle closures: 10 PM – 4 AM nightly from May 1st through October 31st and then only on Friday, Saturday, and pre-holiday Sundays from November 1st through April 30th.
- CDP 6-88-545 granted after-the-fact authorization for installation of a vehicular gate at South Mission Beach Park and installation of a new vehicular gate at Mission Point and authorized vehicle closure from 8 PM – 4 AM during Standard Time and between 10 PM – 4 AM during Daylight Savings Time. CDP Amendment 6-88-545-A authorized the restriping of the South Mission Beach Park parking lot to increase the number of parking spaces and relocate the vehicular gate westward to allow forty parking spaces to be outside the gate and its related vehicle parking closure restrictions.
- CDP 6-89-359 granted after-the-fact authorization for installation of a vehicular gate at the entrance to Fiesta Island in Mission Bay Park and closure of Fiesta Island to vehicles from 10 PM – 4 AM nightly from June 1st through September 30th and only on Fridays and Saturday nights from October 1st through May 31st.

- CDP A-6-LJS-90-161 arose from a public appeal of a City CDP for new parking restrictions at the public parking lot at Kellogg Park in La Jolla Shores. That CDP authorized the installation of vehicular gates and closure of the parking lot to vehicular traffic between 10 PM – 4 AM from November 1 through April 30 and between 12 – 4 AM from May 1 through October 31, as well as require the installation of a mechanism to allow one-way egress for vehicles from the lot after the designated closure time.
- CDP 6-91-146 granted after-the-fact approval for two years for installation of five vehicular gates at four public parking lots in Mission Bay Park at Ventura Cove, Bahia Point, and north Bonita Cove and closure of the lots between 10 PM – 4 AM, with one-way egress for vehicles at Ventura Cove and Bahia Point after the designated closing time. CDP Amendment 6-91-146-A1 extended the authorization for five years, while CDP Amendment 6-91-146-A2 extended the authorization for an additional five years. Subsequently, no further amendments extending the authorization were obtained by the City and the permit expired in 2003. However, the City retained the vehicular gates and continues implementing the previously approved hours to this day.
- CDP 6-02-090 granted a two-year authorization for the installation of four one-way egress vehicle gates at three public parking lots at Crown Point Shores in northern Mission Bay Park and extending the vehicle closure hours to 10 PM – 4 AM. CDP Amendment 6-02-090-A1 changed the location and the number of gates (from four to three) and required only one gate to provide one-way egress. Subsequently, no further amendments extending the authorization were obtained by the City and the permit expired in 2004, but the City retained the vehicular gates and continues implementing the previously approved closure hours to this day.

The thirty-five public parking lots covered by this coastal development permit are located along the City of San Diego's coastline, with some parking lots located within areas of the Commission's original jurisdiction or deferred certification jurisdiction where the Chapter 3 policies of the Coastal Act are the standard of review with the City's certified LCP used as guidance, while other parking lots are in areas of the City's coastal permitting jurisdiction, appealable to the Coastal Commission, where the City's certified LCP is the standard of review. The City has applied to the Coastal Commission for a consolidated coastal development permit to address all the public parking lots.

B. Public Access and Recreation

Section 30210 of the Coastal Act states:

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 of the Coastal Act states:

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 30212 of the Coastal Act states, in relevant part:

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

[...]

Section 30212.5 of the Coastal Act states:

Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

Section 30213 of the Coastal Act states, in part:

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

Section 30214 of the Coastal Act states, in relevant part:

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

- (1) Topographic and geologic site characteristics.
- (2) The capacity of the site to sustain use and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

[...]

Section 30220 of the Coastal Act states:

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Section 30221 of the Coastal Act states:

Oceanfront land suitable for recreational use shall be protected for recreation use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in this area.

Section 30223 of the Coastal Act states:

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

La Jolla Land Use Plan

- Enhance existing public access to the ocean, beach, and park areas such as Ellen B. Scripps Park and Kellogg Park along the shoreline in order to be of greatest benefit to neighborhood residents and visitors to the community.

Mission Bay Park Master Plan

- Mission Bay Park should provide safe, efficient and enjoyable access to all of its recreation areas, minimizing circulation and parking impacts on adjacent residential areas. Traffic and parking should support, but not overwhelm, the Park's recreation areas, the regional parkland areas in particular. Bicycle and pedestrian paths should reach all areas of the Park and extend to adjacent open space corridors in as safe and enjoyable a manner as possible

Mission Beach Precise Plan

- The provision of increased residential, commercial, and recreational parking in order to reduce the serious deficit that presently exists.

Ocean Beach Community Plan

- Implement measures to increase off-street parking available for the community and its visitors.

Peninsula Community Plan

- Establish adequate parking facilities throughout the community to accommodate existing and projected demand, with consideration given to improving and increasing usage of public transportation.
- Existing public parking areas should be maintained and improved.

The City's coastline experiences high levels of year-round use by local residents and visiting tourists due to the ample amenities: sandy beach, boardwalks, volleyball courts, fire rings, public piers, fishing spots, playgrounds, snorkeling, kayaking, surfing, etc. While it is important to note that the City is not proposing to restrict or close access to the beach or shoreline itself, and the parking restrictions would not prevent the public from entering the parking lots and adjacent parklands on foot or bicycle, due to the density of many of the coastal communities and lack of off-street parking, there is limited, if any, parking readily available to the public near many of these parking lots, either during the day or night. When evaluating proposals to restrict vehicle parking, it is important to recognize that while many of the coastal communities of San Diego are walkable, and biking is a popular means of transportation, these alternatives primarily benefit residents who already live near the shore. The City of San Diego spans 375 square miles and traveling from eastern communities to the coast by bus or trolley can take roughly 1.5 hours each way. For most people, biking from inland areas is also not a practical option. The inadequate public parking supply along the coast relative to public demand during the busiest days and months of the year has been a recognized issue in the City for so long that for decades, the City's certified LCP has placed a "Beach Impact Area" overlay zone over the three-to-four blocks closest to the coast wherein development was subject to higher off-street parking requirements than the rest of the City. Given the three-hour round trip on alternative transit and the already high demand for parking in coastal neighborhoods, private vehicles remain the most feasible means of reaching the shoreline for families and many other members of the public.

As the City moves toward incorporating recent state legislation eliminating most parking requirements for new development into its LCP, street parking is likely to become even more limited. Ensuring the availability of public parking therefore remains a critical component of maintaining equitable coastal access for those who do not live within walking or biking distance of the coast. Because housing near the shoreline is often prohibitively expensive, restricting parking tends to disproportionately affect lower-income communities, raising environmental justice concerns. In this way, limitations on parking can translate into limitations on public access to the coast.

As previously described in the Project Background section above and described in [Exhibit 4](#), many parking restrictions along the coast have been implemented without benefit of a CDP, resulting in after-the-fact permit requests when unpermitted closures came to the Commission's attention through public complaints or later City applications. The subject permit is intended to formalize and legalize the restrictions on most of the City's public parking lots along its coast.

San Diego's beaches and coastal parking lots are among the region's most heavily visited public spaces, drawing residents and visitors from early morning through late evening for recreation and shoreline access. The City has reported an increase in nighttime police responses for various incidents and criminal activity in the years following the COVID-19 pandemic, which prompted requests from residents and City staff for stricter nighttime vehicle closure hours at particular parking lots. According to the City, evening and overnight vehicle closures can reduce illegal activity and help the City balance limited nighttime police staffing, who in addition to aiding in the closing of the parking lots, must also conduct all their other patrol duties across their districts of the City.

While the Commission recognizes the desire of both the City and local residents to maintain safe and peaceful communities, it is essential to acknowledge that these are active coastal recreation areas whose character naturally differs from less visited inland neighborhoods. The Coastal Act does not permit public access to be curtailed solely because of the behavior of a small number of individuals. The City possesses ample authority under its police powers to address noise, alcohol violations, and criminal conduct, and consistent enforcement of these existing laws remains the most appropriate and effective means of protecting public health and safety. While reasonable parking restrictions can support these efforts, limiting public access should neither be the first nor the primary tool employed when other enforceable measures already exist.

Striking an appropriate balance between public safety and the Coastal Act's mandate to protect and maximize coastal access is therefore critical. The City seeks to deter activities that are already illegal, and it is important to emphasize that laws governing these behaviors exist and can be enforced without reducing general public access opportunities.

In this case, the City has provided over a hundred pages of substantial, site specific evidence demonstrating that the affected parking lots experience recurring nighttime criminal activity and public safety concerns at levels that warrant a response, and that this activity has been notably elevated for several years [\[Exhibit 6\]](#). The documentation includes detailed logs of police responses, descriptions of observed activity, and information on the strain these incidents place on limited nighttime staffing. The issues prompting the proposed closures are not hypothetical or generalized but are tied to specific locations and specific time periods during which unlawful behavior routinely occurs. Coastal Commission staff held several meetings with City park, police, and lifeguard staff to better understand their operating procedures, the types and number of

issues they have had to address in growing numbers, reporting patterns over the years, and identify the parking lots of greatest issue so as to better focus the City's proposal to modify its parking restrictions.

City and Coastal Commission staff worked together to tailor the proposed restrictions to the minimum hours necessary to address these documented safety concerns. Rather than applying broad, uniform, or precautionary closures, the City evaluated each parking lot individually and determined the minimum closure hours expected to address the level of criminal activity at that location. This individualized, approach demonstrates a good faith effort to minimize limitations on public access and ensures that the proposed restrictions do not impede coastal recreation more than necessary during early morning activities such as "dawn patrol" surfing and later evening activities such as bonfires, which current City regulations allow to up to midnight [Exhibit 7]. As initially proposed by the City's application, several parking lots would have had longer parking closure hours, starting earlier in the night around 10 PM, which can interfere with bonfires, and ending later in the following morning, such as 6 AM, which can interfere with "dawn patrol" surfing. Because many of the City's public parking lots are the primary means for people to access certain beach areas for such activities, especially in or near Mission Bay Park, early closure will substantially interfere with the public's recreational access. After discussing the importance of avoiding these impacts when identifying reasonable measures to achieve the City's public safety goals, Commission and City staff were able to come to agreement on supportable parking restrictions for all thirty-five parking lots covered by this permit [Exhibit 3].

The City also evaluated the alternative of "exit only" motion-sensing drop-down gates or in-ground spike systems, as these could block people from entering the parking lots at a certain time, but allowing existing vehicles to exit. However, while such systems did previously exist at City facilities such as La Jolla Shores, the City concluded that they are often ineffective or unsustainable. Motion sensing gates utilizing lightweight pole arms are easily driven through by vehicles, and spike strips frequently clog with sand or are bypassed by placing boards over them to drive on. In contrast, the metal vehicle gates currently in use at some parking lots and now proposed for additional sites [Exhibit 3] have been determined to be a more reliable and cost-effective deterrent.

In addition, the City is proposing new four-hour maximum parking durations in two parking lots in the Ocean Beach community: the Ocean Beach Pier on Newport Avenue and the nearby parking lot at the end of Santa Monica Avenue. The purpose of these restrictions is to address community concerns that people are parking all day and limiting access due to limited parking turnover. The Commission finds that four hours are adequate time for members of the public to transport and assemble recreational equipment and partake in coastal recreational activities.

As discussed in detail below in Section C: Unpermitted Development, the City implemented several new parking restrictions and retained parking restrictions beyond their permitted timeframe without the benefit of a CDP or CDP amendment. To help avoid and offset the potential impacts to public access associated with the impacts to

public access from these past unpermitted restrictions, as well as the proposed parking restrictions, the City is proposing a suite of public access and recreational enhancements that will expand lower cost coastal access opportunities and improve the public's ability to reach and enjoy the shoreline. The installation of additional bicycle parking facilities at multiple locations throughout Mission Bay Park will improve access for cyclists and enhance the ability of people to reach and use popular shoreline parks and recreation areas. Expansion of the area of mobility mats will be placed seasonally at major lifeguard stations and park sites will increase barrier free access across sandy beach areas, improving shoreline access for individuals with mobility limitations. The development of printed maps, new on-site map panels, and an interactive online map with QR code access is intended to improve wayfinding by providing clear, readily available information on access points, parking areas, recreational amenities, and transit connections. In addition, installation of informational panels at Sunset Cliffs Park will enhance public education and foster greater understanding of coastal processes. Collectively, these measures will improve accessibility, enhance the public's use and understanding of coastal resources, and help offset the incremental effects of the proposed parking restrictions.

In addition, the City has proposed a collaborative partnership with the La Jolla Coastal Conservancy (LJCC) to repair and reopen the existing South Casa Beach stairway in La Jolla. The stairway is located at South Casa Beach in La Jolla, immediately south of Children's Pool and west of Coast Boulevard. The staircase has been closed for over two years following structural failures caused by severe storm and surf events in winter 2023–2024, which damaged the lower cantilevered portion of the structure. The proposed project would restore safe, formalized beach access to a popular site within the existing footprint [[Exhibit 9](#)].

The preliminary plan for repairs of the stairway includes replacement of the damaged lower concrete treads, installation of a new caisson supported landing designed to withstand gravity and lateral coastal forces, and reorientation of the lower stair run parallel to the shoreline to reduce exposure to direct wave impact. The staircase repair itself will still require a separate coastal development permit, most likely a consolidated permit due to its beachfront location. Project design and permitting are scheduled to take place from 2026 through 2029, followed by approximately one year of construction beginning in 2029 and reopening in late 2030.

Although the La Jolla Coastal Conservancy will serve as the lead applicant, responsible for all project costs, engineering design, permit submittals, and construction contracting, the City's participation provides meaningful procedural support that will facilitate the project's development and implementation. As described in the City's draft proposal, staff from the City Parks and Recreation Department will review project plans, ensure that the design complies with applicable City standards, and guide the applicant through required discretionary and building permit processes. The City would also assist with coordinating interdepartmental reviews, support the preparation of permit materials, and oversee construction inspections and final project acceptance. While these responsibilities do not constitute a major capital or design role, the City's involvement

provides regulatory continuity and operational oversight that will help ensure an efficient permitting process and a compliant, durable repair of this public accessway.

To address the implementation of the approved parking restrictions, **Special Condition No. 1** requires the submittal of a public parking plan memorializing all of the approved parking restrictions – the location, hours, prohibited activities, and approved gates – for the record and to provide future reference to avoid future instances of unpermitted changes to parking access. **Special Condition No. 2** requires submittal of an approved program to implement several public access improvements by the City to mitigate for impacts arising from past unpermitted restrictions on public parking on the coast. **Special Condition No. 3** requires the submittal of a plan detailing the future actions to design, fund, permit, and construct the improvements to the currently closed South Casa Beach access stairs in La Jolla as an additional component of the City’s required mitigation for past public access impacts. **Special Condition No. 4** limits the duration of this permit to ten years from the date of Commission approval so as to allow all parties adequate time to observe the impacts and benefits that may arise from the revised parking restrictions and inform any future proposals to extend or modify them. Because the purpose of this permit is to comprehensively formalize and revise parking restrictions among the majority of the City’s public parking lots, several of which have past permit history, **Special Condition No. 5** makes clear that this current permit action will supersede the listed past permits in order to implement the parking restrictions approved herein. Finally, **Special Condition No. 6** states that this permit will be deemed issued and vested upon approval by the Coastal Commission so as to enhance the enforceability of the permit’s requirements on these already existing parking lots.

It is important to note that while restrictions on all of the subject lots are being reviewed together in order to address a range of current issues and past violations, as well as to get a sense of the extent of coastal parking restrictions, the various lots are located along miles of coastline and serve recreational users with differing needs, including joggers, fishermen, divers, boaters, surfers, and others. Conditions vary from site to site, including nearby amenities, surrounding neighborhood patterns, and availability of alternative parking resources. For these reasons, decisions regarding parking limitations must be made on a location specific basis and cannot be assumed to establish precedent for other coastal areas seeking similar restrictions. However, based on the site specific documentation of recurring nighttime public safety issues, the City’s efforts to limit the proposed closure hours to the minimum necessary at each location, and the inclusion of measures to offset potential access impacts, the Commission finds that the proposed restrictions have been appropriately tailored to address documented concerns while maintaining maximum feasible public access. As proposed and conditioned, the closures preserve pedestrian and bicycle access, retain most daytime and early evening recreational opportunities, and are not expected to result in significant adverse effects on coastal access or recreation.

Therefore, the Commission finds the proposed restrictions, as conditioned, consistent with the public access and recreation policies of the Coastal Act and the certified San Diego LCP in this case.

C. Unpermitted Development

The imposition or modification of limits on the public's ability to park their vehicles in the coastal zone constitutes "development" as defined in the Coastal Act Section 30106 and "coastal development" as defined in Section 113.0103 of the City of San Diego's Land Development code, which serves as the primary component of their certified Implementation Plan. As described in the Background section of the staff report, unpermitted development has occurred at several of the subject parking areas without the required coastal development permit. During review of the project, Commission staff determined that numerous parking lots contained signage, gate installations, and operational restrictions that continued subsequent to expiration of prior CDPS or differed from those authorized in prior CDPs and were not supported by subsequent amendments [[Exhibit 4](#)]. In addition to these long standing inconsistencies, Commission staff learned that beginning in 2019, the City instituted a full, year-round vehicular closure of Mariner's Point to public parking without benefit of a coastal development permit, and that this closure remains in effect. The cumulative effect of these unpermitted restrictions has been a reduction in public parking availability within shoreline and park-adjacent areas that serve as primary access points to segments of Mission Bay Park and coastal recreation amenities. The City is therefore seeking after-the-fact approval of past parking restrictions as shown on [Exhibit 3](#). This will bring existing operations into compliance and establish a clear, enforceable baseline for future management.

Collectively, these unpermitted changes resulted in a reduction in legally available coastal parking in areas that serve as primary access points to Mission Bay Park, the shoreline, and adjacent recreational amenities. However, it's important to note that while the unpermitted operational changes affected access to public parking areas, the practical impacts to public access were likely relatively limited in most cases. For many of the lots, the City continued to implement the same parking restriction hours and signage that had previously been authorized under earlier coastal development permits, but simply did so after those permits had expired without securing the necessary extension amendments. As a result, although the continuation of these restrictions constituted "development" requiring Commission review, they generally maintained longstanding, approved operational patterns rather than introducing new or previously unreviewed limitations. In these locations, the effect of the violation was therefore procedural rather than a substantial new constraint on access.

The year-round closure of Mariner's Point represents a more significant deviation from past approvals, as it had no past permit precedent and was a complete full-time closure, but its access effects must also be viewed in context. The closure eliminated a portion of parking supply used heavily during peak events but did not eliminate access to the surrounding shoreline as parking spaces outside of the gate were still available, alternative lots remained available in the immediate Mission Bay Park area, and the closure was not accompanied by physical improvements that would impede future re-opening under a Commission authorized permit. Taken together, the unpermitted

development resulted in incremental, rather than widespread or severe, impacts to coastal access.

Mitigation

To address and offset the public access impacts associated with the unpermitted development and the proposed restrictions, the City has proposed to implement a suite of public access improvements, incorporated into the requirements of Special Condition 2. These improvements include installation of eleven new bicycle parking facilities (which can include bike racks, bike lockers, etc.) across Mission Bay Park; expansion of mobility mat areas that the City seasonally places on the sandy beach at major lifeguard stations and park locations to improve both vertical and lateral access for mobility devices such as beach wheelchairs; distribution of printed 8.5" x 11" maps of coastal park facilities; installation of on-site map panels at Mission Beach Park and Mission Bay Park; development of an interactive online map with access points, parking lots, and transit routes accessible via QR code; and installation of informational panels at Sunset Cliffs Park explaining tidal processes and coastal erosion. Together, these measures will enhance lower cost recreation and coastal access, improve wayfinding and mobility for a wide range of users, and meaningfully assist the public in navigating the City's coastal parks.

In addition, Special Condition No. 3 requires the City to implement its proposed collaborative effort with the La Jolla Coastal Conservancy to repair the South Casa Staircase. This program which has been proposed by the City, requires the City to provide support to the LJCC in its efforts to repair this important coastal access accessway that has been closed due to storm damage. The City must return to the Commission for an amendment if project milestones cannot be met. This condition addresses a distinct but related access concern and provides additional public access benefits over the life of this permit.

Taken together, the mitigation required through Special Conditions 2 and 3 provides a reasonable and proportional response to the access impacts resulting from the unpermitted development and ensures resolution of the existing violations. Upon issuance of the permit and implementation of all required conditions, the violations described above will be resolved. Because there is existing unpermitted development on the site, the subject permit will issue upon Commission approval as provided by Special Condition No 6 to ensure that the applicant expediently implements the proposed resolution to resolve the violations described above. Upon issuance of the permit, the subsequent performance of the work authorized by the permit in compliance with all of the terms and conditions of the permit will result in resolution of the violations specifically described above. Failure to abide by the conditions of the permit would constitute a separate violation.

Although development has taken place prior to the submission of this permit application, consideration of this application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act and the City's certified LCP. Commission review and action on this permit does not constitute a waiver of any legal action with regard to

the alleged violations (or any other violations), nor does it constitute an implied statement of the Commission's position regarding the legality of development, other than as specifically expressed herein, undertaken without a coastal permit.

D. Local Coastal Planning

Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The thirty-five public parking lots addressed by this permit are located across seven of the City's community planning areas: University, La Jolla, Pacific Beach, Mission Beach, Mission Bay Park, and Peninsula. The City's Local Coastal Program was first certified in 1988, when most of the coastal zone within those community planning areas except for Mission Bay Park was transferred to City jurisdiction. The LUP for the Mission Bay Park segment of the City of San Diego LCP, the Mission Bay Park Master Plan, was certified on May 11, 1995, but no implementation plan has been developed as yet, and Chapter 3 of the Coastal Act remains the legal standard of review for that segment.

As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act and with the certified Land Use Plans for the community planning areas. Approval of the project, as conditioned, will not prejudice the ability of the local government to continue to implement its certified LCP or prepare an LCP for Mission Bay Park that is in conformity with the provisions of Chapter 3 of the Coastal Act.

E. California Environmental Quality Act

Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment. The City of San Diego deemed this project categorically exempt from CEQA pursuant to California Code of Regulations, Title 14, Sections 15301 [repairs] and 15311 [minor structures].

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions addressing manner and hours of parking limits, erection of vehicular gates, and public access enhancements will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

Appendix A – Substantive File Documents

- CDP No. 6-88-366
- CDP No. 6-88-545
- CDP No. 6-88-545-A
- CDP No. 6-89-359
- CDP No. A-6-LJS-90-161
- CDP No. 6-91-146
- CDP No. 6-91-146-A
- CDP No. 6-91-146-A2
- CDP No. 6-02-090
- CDP No. 6-02-090-A1
- San Diego Police Department Citations and Arrests Logs [various park units]