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STAFF REPORT: APPEAL – NO SUBSTANTIAL ISSUE

Appeal Number:	**A-5-LGB-26-0014**
Applicant:	**City of Laguna Beach Public Works and Utilities Department**
Local Government:	City of Laguna Beach
Local Decision:	Approval with Conditions
Appellants:	Woods Cove Owners Association (Attn: Paul Merritt), Rex Claytor, and Bryan Menne
Project Location:	Coast Hwy. between Ruby St. and 500 feet south of Vista Del Sol, and portions of the following intersecting streets: Upland Rd., Eagle Rock Wy., Catalina Ave., 2nd Ave., 3rd Ave., 4th Ave., 5th Ave., 9th Ave., extending up to 165 feet inland from their intersections with Coast Hwy.
Project Description:	Appeal by the Woods Cove Owners Association (Attn: Paul Merritt), Rex Claytor, and Bryan Menne of City of Laguna Beach decision granting permit with conditions to the City of Laguna Beach for implementation of a one-year pilot parking program to install 22 multi-space pay stations, delineate 501 marked on-street parking spaces (paid and unpaid), install associated regulatory signage, and landscaping maintenance along approximately three miles of Coast Highway.
Staff Recommendation:	No Substantial Issue

IMPORTANT HEARING PROCEDURE NOTE

This is a substantial issue only hearing. Testimony will be taken only on the question of whether the appeal raises a substantial issue. Generally, and at the discretion of the Chair, testimony is limited to 3 minutes total per side. Please plan your testimony accordingly. Only the applicant, persons who opposed the application before the local government (or their representatives), and the local government shall be qualified to testify. Others may submit comments in writing. If the Commission determines that the appeal does raise a substantial issue, the de novo phase of the hearing will occur at a future Commission meeting, during which it will take public testimony.

SUMMARY OF STAFF RECOMMENDATION

On May 6, 2026, the Laguna Beach Planning Commission held a public hearing on local CDP 2026-0617. The Planning Commission approved the project via Resolution No. 2026-0617. No local appeals were filed. The City's Notice of Final Local Action for Local CDP No. 25-0260 was received in the Coastal Commission's Long Beach Office on June 3, 2026, and the Coastal Commission's required 10 working-day appeal period was established. On June 5, 2026, the appellants filed timely appeals of the City's local CDP approval. No other appeals were received prior to the end of the appeal period at 5:00 PM on June 17, 2026.

The appellants contentions include: 1) the City incorrectly found the project to be categorically exempt under CEQA Sections 15301 and 15304, and the project requires a full environmental impact report and/or mitigated negative declaration; 2) the pilot parking program violates Suggested Modification 11 of LCPA No. LGB-MAJ-1-10, which prohibits the establishment of preferential parking districts; 3) the project will negatively impact public access, which is protected by the Coastal Act and will reduce the number of parking spaces in the area; 4) public participation, noticing, and local review were deficient throughout the City's approval process; 5) the project misuses public funds which should be directed towards alternative projects, including but not limited to, public amenities such as additional restrooms, construction of a new parking garage, and establishment of residential parking permits; 6) the City did not demonstrate the project's compliance with ADA requirements; and 7) the pilot parking program will result in parking enforcement issues, dangerous Coast Highway crossings, ticket traps, and new parking impacts in adjacent neighborhoods.

The grounds for an appeal require an allegation that the development does not conform to the standards set forth in the certified LCP or the public access and recreation policies of the Coastal Act. Contentions 1, 4, 5, 6, and 7 do not raise any relevant LCP or Coastal Act consistency issues and are not a valid ground for appeal. Regarding Contention 2, the City did not approve any preferential parking districts through this action that would be inconsistent with Land Use Element Policy 5.4. Contention 3 raises concerns with potential impacts to public access, however, more than half of the newly established spaces will remain free and will continue to offer public parking along Coast Highway. The proposed parking rates are comparable to, and in some cases lower than, rates charged in nearby

coastal jurisdictions. Additionally, the City utilizes revenue from paid parking throughout the City to fund the City's free trolley service, which provides free transportation services to visitors and residents with connections to adjacent low-cost and free parking lots. As a result, members of the public would still have access to free or low-cost parking in this location, and the proposed five-hour time restriction is designed to allow members of the public to access the coast while encouraging turnover. The subject pilot program is authorized only for a period of one year. Therefore, should the City find the program has any adverse impact on public access, the City may re-evaluate ways to improve access in the project area before implementing any permanent solutions.

The issues raised by the appellants do not demonstrate that the proposed project is inconsistent with the certified LCP. Therefore, staff recommends that the Commission determine that **no substantial issue exists**. The motion to carry out the staff recommendation (No Substantial Issue) is on Page 4.

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I. MOTION AND RESOLUTION – NO SUBSTANTIAL ISSUE

Motion: I move that the Commission determine that Appeal No. A-5-LGB-26-0014 raises NO Substantial Issue with respect to the grounds on which the appeal has been filed under § 30603 of the Coastal Act.

Staff recommends a **YES** vote. Passage of this motion will result in a finding of No Substantial Issue and adoption of the following resolution and findings. If the Commission finds No Substantial Issue, the Commission will not hear the application de novo and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the Commissioners present.

Resolution: The Commission hereby finds that Appeal No. **A-5-LGB-26-0014** does not present a substantial issue with respect to the grounds on which the appeal has been filed under Section 30603 of the Coastal Act regarding consistency with the certified Local Coastal Plan and/or the public access policies of the Coastal Act.

II. APPELLANTS' CONTENTIONS

On June 5, 2026, three appeals were filed by the Woods Cove Owners Association (Attn: Paul Merritt), Rex Claytor, and Bryan Menne (**Exhibit 3**). The appeals raise the following concerns with the City-approved development:

1) The City incorrectly found the project to be categorically exempt under CEQA Sections 15301 and 15304, and the project requires a full environmental impact report and/or mitigated negative declaration.
2) The pilot parking program violates Suggested Modification 11 of LCPA No. LGB-MAJ-1-10, which prohibits the establishment of preferential parking districts.
3) The project will negatively impact public access, which is protected by the Coastal Act and will reduce the number of parking spaces in the area.
4) Public participation, noticing, and local review were deficient throughout the City's approval process.
5) The project misuses public funds which should be directed towards alternative projects, including but not limited to, public amenities such as additional restrooms, construction of a new parking garage, and establishment of residential parking permits.
6) The City did not demonstrate the project's compliance with ADA requirements.
7) The pilot parking program will result in parking enforcement issues, dangerous Coast Highway crossings, ticket traps, and new parking impacts in adjacent neighborhoods.

III. LOCAL GOVERNMENT ACTION

On May 6, 2026, the Laguna Beach Planning Commission held a public hearing on local CDP 2026-0617. The Planning Commission approved the project via Resolution No. 2026-

0617 (**Exhibit 4**). No local appeals were filed. The City's Notice of Final Local Action for Local CDP No. 25-0260 was received in the Coastal Commission's Long Beach Office on June 3, 2026, and the Coastal Commission's required 10 working-day appeal period was established. On June 5, 2026, the appellants filed timely appeals of the City's local CDP approval (**Exhibit 3**) after speaking and providing written comments at the local hearing. No other appeals were received prior to the end of the appeal period at 5:00 PM on June 17, 2026.

IV. APPEAL PROCEDURES

After certification of an LCP, the Coastal Act provides for limited appeals to the Coastal Commission of certain local government actions on CDPs. Development projects approved by cities or counties may be appealed if they are located within certain geographic appealable areas, such as those located between the sea and the first public road paralleling the sea, or within 100 feet of any wetland, estuary, or stream, or within 300 feet of the top of the seaward face of a coastal bluff; or if located within 300 feet of the inland extent of any beach or the mean high tideline of the sea where there is no beach, whichever is greater.

Section 30603 of the Coastal Act states in relevant part:

> (a) After certification of its Local Coastal Program, an action taken by a local government on a Coastal Development Permit application may be appealed to the Commission for only the following types of developments:
>
> (1) Developments approved by the local government between the sea and the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tide line of the sea where there is no beach, whichever is the greater distance.
>
> (2) Developments approved by the local government not included within paragraph (1) that are located on tidelands, submerged lands, public trust lands, within 100 feet of any wetland, estuary, stream, or within 300 feet of the top of the seaward face of any coastal bluff.

The project site is in an appealable area due to some of the development's location between the sea and the first public road paralleling the sea and because some of the project site is within 300 feet of the top of the seaward face of a coastal bluff. (See Sections 30603(a)(1), (2).) The issues raised in the subject appeal apply to proposed development located in the appealable area.

Grounds for Appeal

The grounds for appeal of an approved local CDP that is appealable to the Commission are stated in Section 30603(b)(1):

> The grounds for an appeal pursuant to subdivision (a) shall be limited to an

> allegation that the development does not conform to the standards set forth in the certified Local Coastal Program or the public access policies set forth in this division.

Section 30625(b)(2) of the Coastal Act requires the Commission to conduct a de novo review of the appealed project unless the Commission determines that no substantial issue exists with respect to the grounds on which an appeal has been filed pursuant to Section 30603(a). If Commission staff recommends a finding that a substantial issue does exist, and there is no motion from the Commission to find no substantial issue, the substantial issue question will be considered presumed, and the Commission will conduct the de novo portion of the public hearing on the merits of the project at a later time. A de novo review of the application on the merits uses the certified LCP as the standard of review (Section 30604(b)). Sections 13110-13120 of Title 14 of the California Code of Regulations further explain the appeal hearing process.

Qualifications to Testify Before the Commission

In this case, because staff is recommending that the appeal raises no substantial issue, the Commission will hear arguments and vote on the substantial issue question. Generally, and at the discretion of the Chair, qualified persons will have three minutes per side to address whether the appeal raises a substantial issue. As noted in Section 13117 of Title 14 of the California Code of Regulations, the only persons qualified to testify before the Commission at the substantial issue portion of the appeal process are the applicant, the appellants, who opposed the application before the local government (or their representatives), and the local government. Testimony from other interested parties that did not oppose the application before the local government must be submitted in writing.

Upon the close of the public hearing, the Commission will vote on the substantial issue matter. It takes a majority of Commissioners present to find that no substantial issue is raised by the local approval of the subject project. If the Commission finds that the appeal raises a substantial issue, the de novo phase of the hearing will occur at a later hearing, during which the Commission will take public testimony.

V. FINDINGS AND DECLARATIONS – NO SUBSTANTIAL ISSUE

A. Project Location And Description

The project site is along an approximately three-mile stretch of Coast Highway between Ruby St. and 500 feet south of Vista Del Sol (**Exhibit 1**). The project site also extends up to 165 feet inland from the intersections between the following streets and Coast Highway: Upland Rd., Eagle Rock Wy., Catalina Ave., 2nd Ave., 3rd Ave., 4th Ave., 5th Ave., and 9th Ave., in the City of Laguna Beach in Orange County. The site ranges from approximately 150 to 1,000 ft. inland from the beach and in some locations in South Laguna is located along the first public road parallel to the sea (Coast Highway) and the sea. The majority of Coast Highway in Laguna Beach falls within the appeal jurisdiction for various reasons. Public access to the coast exists along Coast Highway at six key access points to Treasure Island Beach, Aliso Beach, West Street Beach, and Thousand Steps Beach.

The City-approved project is described as a pilot program for 1 year to implement parking regulations for public parking in the areas described above along Coast Highway and along some residential streets. The program would establish approximately 501 new delineated parking spaces, each measuring eight feet by twenty-two feet along existing public streets where public parking is already allowed by painting space boundaries on the existing asphalt (**Exhibit 2**). Of these, approximately 264 spaces will be designated as unmetered, free public parking, and approximately 237 spaces will be designated as metered, paid public parking for the 1-year program. In addition, approximately 79 existing metered paid public spaces within the project area will be re-painted and will continue to remain without modification. The City also proposes to maintain existing vegetation within the public right-of-way, by trimming overgrown shrubs only where they currently impede pedestrian access. Parking time restrictions will be in effect from 8:00 AM to 7:00 PM, for the 1-year pilot program. The project will establish a maximum parking duration of five hours for both paid and unpaid spaces. Time limits will not be enforced outside these hours so parking overnight will remain free. The project includes the installation of 22 new parking pay stations throughout the project site. After the 1-year term, the City can evaluate the effectiveness of the program, adjust the program if necessary, and approve a new permit to establish the program on a more permanent basis.

B. Local Coastal Program

The City of Laguna Beach LCP was approved with suggested modifications, except for the areas of deferred certification, in July 1992. In February 1993 the Commission concurred with the Executive Director's determination that the suggested modifications had been properly accepted and the City assumed permit issuing authority at that time. The City's LCP is comprised of a Land Use Plan (LUP) and an Implementation Plan (IP). The City's Land Use Plan is comprised of a variety of planning documents including the Land Use Element (LUE), Open Space/Conservation Element, Technical Appendix, and Fuel Modification Guidelines (of the Safety General Element of the City's General Plan as adopted by Resolution 89.104). The Implementation Plan (IP) of the City of Laguna Beach certified Local Coastal Program (LCP) is comprised of over 10 documents, including Title 25, the City's Zoning Code. The Coastal Land Use Element of the LCP was updated and replaced in its entirety via LCPA 1-10 in 2012. The Open Space/Conservation Element and Title 25 have been amended a number of times since original certification. Laguna Beach has a certified Local Coastal Program (LCP), but there are four areas of deferred certification in the City: Irvine Cove, Blue Lagoon, Hobo Canyon, and Three Arch Bay. The project site is located within the City of Laguna Beach's certified jurisdiction and is subject to the policies of the certified LCP.

C. Factors to be Considered in Substantial Issue Analysis

When determining whether an appeal raises a "substantial issue," Section 13115(c) of the Commission's regulations provide that the Commission may consider factors, including but not limited to:

1. The degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the applicable standard of review;

2. The extent and scope of the development as approved or denied by the local government;

3. The significance of the coastal resources affected by the decision;

4. The precedential value of the local government's decision for future interpretations of its LCP; and

5. Whether the appeal raises local issues, or those of regional or statewide significance.

The Commission may, but need not, assign a particular weight to a factor.

Staff recommends that the Commission finds that **no substantial issue exists** with respect to whether the local government action conforms to the provisions of the City's certified LCP and public access and recreation policies of the Coastal Act for the reasons set forth below.

D. Substantial Issue Analysis

As stated in Section IV of this report, the local CDP may be appealed to the Commission on the grounds that the proposed development does not conform to the standards set forth in the City's certified 1980 LCP or the public access and recreation policies of the Coastal Act. Pursuant to Section 30625(b) of the Coastal Act, the Commission must assess whether the appeal raises a substantial issue with respect to the grounds upon which the appeal was filed pursuant to Section 30603 of the Coastal Act.

Appellants' Contention No. 1: CEQA Exemptions

The appellants contend that the City incorrectly found the project to be categorically exempt under CEQA Sections 15301 and 15304, and that the project requires a full environmental impact report and/or mitigated negative declaration (**Exhibit 3**). The appellants also contend that pursuant to CEQA §15300.2(c) the exemption should be precluded due to the project's location within the appeals jurisdiction and that an Initial Study should be required through CEQA Appendix G. As the appellants state, the City found the project to be categorically exempt under CEQA §15301 (Existing Facilities), finding that the project involves minor alterations to existing streets and rights-of-way with no expansion of use, including temporary pay stations, parking delineation, signage consistent with §15301(c), and limited landscaping maintenance under §15301(h). The City additionally found the project to be exempt under CEQA §15304(e) (Minor Alterations to Land) as a temporary public parking use with negligible, non-permanent environmental effects and no removal of healthy, mature, or scenic trees.

In this case, the City of Laguna Beach is the lead agency responsible for certifying that the proposed project is in conformance with CEQA. CEQA Guidelines §15051 states that where two or more public agencies will be involved with a project, the public agency that carries out the project "shall be the lead agency even if the project would be located within the jurisdiction of another public agency." Here, the City is both. First, the City is the public

agency that will carry out the project. Further, Coast Highway and the intersecting streets associated with the subject project are on public lands in Laguna Beach within the City's LCP jurisdiction. The City, therefore, has jurisdiction over the activities within the project area. The appellants' assertion is not relevant to this Commission's consideration of this appeal. The Commission would be a responsible agency for the project if the project was within the Commission's jurisdiction. Accordingly, the Commission does not evaluate the sufficiency of the lead agency's CEQA determination and further this contention is not a valid ground for appeal.

Therefore, the Commission finds the contention that the City incorrectly found the project to be categorically exempt under CEQA Sections 15301 and 15304, and that the project requires a full environmental impact report and/or mitigated negative declaration raises no substantial issue with respect to the project's conformance to the certified LCP.

Appellants' Contention No. 2: Violation of LCP Parking Policy

The appellants contend the pilot parking program violates Suggested Modification 11 of LCPA No. LGB-MAJ-1-10, which prohibits the establishment of preferential parking districts. The appellants attached a letter from the City of Laguna Beach dated April 2, 2026, to their appeals (**Exhibit 3**), which elaborates on the referenced policy. The Commission approved LCP Amendment No. LGB-MAJ-1-10 on December 7, 2011, with suggested modifications. Suggested Modification 11 is reflected in the LCP as Land Use Element (LUE) Policy 5.4 (**emphasis added**):

> Preserve and maintain the residential character and livability of neighborhoods adjacent to commercial districts and/or individual businesses by regulating and minimizing impacts from commercial activities, including but not necessarily limited to deliveries, amplified music, light trespass, alcohol-related impacts, and employee or valet parking. **Establishment of any new preferential parking districts in the coastal zone shall be prohibited**.

The appellants assert that the City-approved pilot parking program, along with City parking permit programs that exempt permit holders from meter fees, operates as a de facto restricted residential parking zone. The City of Laguna Beach has some existing parking permit programs, such as the Laguna Beach Shopper Permit, which may be purchased from the City by residents to park at City meters for the posted amount of time without additional payment. Programs such as these, however, are existing, and the City did not approve any new programs through this action that are subject to this appeal. The installation of additional pay stations and delineation of parking spaces does not constitute a preferential parking district.

A preferential parking district gives priority parking to residents with permits. In this case, the program does not offer priority parking to residents with a permit as they have to abide by the same five-hour time limits as the general public, and they are paying the fees (by purchasing the permit) ahead of time, without paying an individual meter or a pay station. The residents who live on these streets will compete for parking spaces along with the

general public.

Therefore, the Commission finds the contention that the pilot parking program violates Suggested Modification 11 of LCPA No. LGB-MAJ-1-10 raises no substantial issue with respect to the project's conformance to the certified LCP.

Appellants' Contention No. 3: Public Access

The appellants contend the project will negatively impact public access, which is protected by the Coastal Act (**Exhibit 3**). The appellants also contend the program will result in a loss of parking for residents and reduce the total number of spaces available in the area. While the appellants did not cite specific access policies, the Coastal Act contains these general access policies:

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 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: …
>
> (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.

Coastal Act access policies can only apply to the portions of the subject project that are located between the first public road and the sea. Generally speaking, this includes Coast Highway adjacent to Three Arch Bay, Lagunita, or in narrow stretches where there are no residential streets seaward of Coast Highway, such as Aliso Beach or Thousand Steps Beach. Currently, the project area along Coast Highway provides unmarked, free curbside parking, except for a limited number of existing single-space meters. There are no time restrictions along the unmarked curb segments. By converting some of the existing free curbside parking into paid parking, the appellants contend the project will negatively impact public access to the coast. In contrast, the City's findings of approval state that the pilot program is specifically designed to reduce congestion and improve circulation along Coast

Highway during peak summer months, and that installing pay stations, marked parking spaces, and related signage will improve parking efficiency and create safer conditions for cyclists and pedestrians, thereby improving public access. In addition, more than half of the newly established spaces will remain free and will continue to offer free public parking along Coast Highway.

In some circumstances, converting free parking areas into paid parking near coastal access points could impede public access to the coast. In this case, users would be charged a rate of $3.95 per hour between 8:00 AM and 7:00 PM, for a maximum of five hours ($19.75 daily maximum) while maintaining free, unrestricted overnight parking. The City's pilot parking program also proposes a five-hour time limit during enforcement hours. A total of 264 spaces will be designated as unmetered, free parking, and 237 spaces will be designated as metered, paid parking. Therefore, more than half of the spaces would remain free to the public. As a result, members of the public would still have access to free parking in this location, and the proposed five-hour time restriction is designed to allow members of the public to access the coast while encouraging turnover.

Although approximately half of the spaces would be converted into metered, paid parking, the proposed rate provides a low-cost option for parking in close proximity to six coastal access points. The City's findings state, "The proposed hourly rate is comparable to, and in some cases lower than, rates charged in nearby coastal jurisdictions with similar parking demand." Additionally, the City utilizes revenue from paid parking throughout the City to fund the City's free trolley service, which provides free transportation services to visitors and residents with connections to adjacent low-cost and free parking lots. According to the City's Planning Commission staff report, the trolley service supports approximately 800,000 annual boardings to connect parking lots to more than 30 beaches within the City, including South Laguna destinations such as Thousand Steps Beach, Totuava Bay, Table Rock Cove, Aliso Beach, Treasure Island Beach, and West Street Beach. The City's staff report further notes that expenditures for trolley services are increasing by approximately four to five percent annually. Therefore, additional revenue is necessary in order to maintain the free services for both visitors and residents.

The appellants also contend the program will result in a loss of parking for residents and reduce the total number of spaces available in the area. Specifically, the appellants assert the proposal would result in a loss of 13 parking spaces between 8th, 9th, and 10th Ave. and a loss of 50 parking spaces along Coast Highway and inland side streets for a total of 63 spaces lost (**Exhibit 3**). However, the project area currently contains unmarked curbside parking. The proposed project does not remove existing parking within the project area but rather establishes delineated parking spaces, and although there could be a loss of unregulated parking spaces, the project would provide approximately 501 code-compliant parking spaces to improve safe access. As such, the proposal does not constitute a reduction in the number of parking spaces, given the existing condition does not provide delineated spaces.

The subject pilot program is authorized only for a period of one year (**Exhibit 4**). Therefore, should the City find the program has any adverse impact on public access, the City may re-evaluate ways to improve access in the project area before implementing any

permanent solutions. As a result, the pilot program is intended to inform future management decisions to maintain and improve access within and adjacent to the project area, consistent with Coastal Act Sections 30210 and 30214.

Therefore, the Commission finds the contention that the project will negatively impact public access to the coast raises no substantial issue with respect to the project's conformance to the certified LCP.

Appellants' Contention No. 4: Local Approval Process

The appellants contend public participation, noticing, and local review were deficient throughout the City's approval process (**Exhibit 3**). Specifically, the appellants raise the following concerns with the approval process: 1) the project bypassed the City's Parking and Traffic Circulation Commission; 2) late modifications to the City-approved project did not allow members of the public sufficient time for review; 3) noticing for local hearings was not sufficient; and 4) the Commission's South Coast district office was closed for three days during the first week of May, which impacted the appellants' ability to research the project.

The grounds for an appeal require an allegation that the development does not conform to the standards set forth in the certified LCP or the public access and recreation policies of the Coastal Act, which are not referenced in the appellants' contentions. In any case, the City appears to have provided sufficient public outreach and participation. According to the record, City staff held a public workshop on April 21, 2026, to gather community input on the proposed pilot program. The Laguna Beach Planning Commission held a public hearing on May 6, 2026, on local CDP 2026-0617, and the Planning Commission approved the project. Therefore, according to the City records, the City held a public outreach workshop and a public hearing regarding the City-approved project. As stated previously, there was no local appeal filed. If the appellants were concerned about noticing and the local process, they could have pursued a local appeal. It should be noted for the record that the South Coast District office was not closed during the first week of May and staff were available in the office to assist the public, however, several staff members were out for a training staff event. The appellants did communicate with relevant staff members prior to filing the appeal and received assistance prior to the end of the appeal period.

Therefore, the Commission finds the contention that public participation, noticing, and local review were deficient throughout the City's approval process raises no substantial issue with respect to the project's conformance to the certified LCP.

Appellants' Contention No. 5: Project Alternatives

The appellants contend that the project misuses public funds which should be directed towards alternative projects, including but not limited to, public amenities such as additional restrooms, construction of a new parking garage, improved signage at alternative parking locations, and establishment of residential parking permits (**Exhibit 3**). Additionally, the appellants raise concerns with local marketing efforts to attract visitors to the area, contributing to parking demand. However, the grounds for an appeal are subject

to the City-approved project and the City's proposed use of the funds is not before the Commission upon appeal. The appellants do not provide any allegation that the City-approved development does not conform to the standards set forth in the certified LCP or the public access and recreation policies of the Coastal Act but rather identify preferred alternatives to the City-approved project, which are not a valid ground for appeal.

Therefore, the Commission finds the contention that the project misuses public funds which should be directed towards alternative projects raises no substantial issue with respect to the project's conformance to the certified LCP.

Appellants' Contention No. 6: ADA Compliance

The appellants contend the City did not demonstrate the project's compliance with ADA requirements (**Exhibit 3**). Section 30210 of the Coastal Act requires maximum access and recreational opportunities be provided for all people. According to the City-approved plans (**Exhibit 2**), the City did not include dedicated accessible stalls as part of the project. Commission staff contacted City staff for additional information regarding the City's analysis of dedicated accessible stalls on July 17, 2026. City staff clarified that there is no statutory or regulatory requirement mandating standard public on-street parallel parking spaces to feature dedicated accessible stalls pursuant to the Americans with Disabilities Act, Title 24 of the California Building Code, or Coastal Commission guidelines. City staff explained that although this particular project does not include dedicated accessible stalls, the City maintains off-street parking lots equipped with designated ADA-compliant parking stalls, and access points such as Main Beach and Aliso Beach are equipped with accessible pathways for safe navigation to the sandy beach and shoreline. Additionally, the City clarified that pursuant to California Vehicle Code Section 22511.5, any individual displaying a valid, state-issued disabled person placard or license plate is authorized to park for an unlimited period of time and at no cost in any on-street metered space or parking stall, which would apply to the subject project. Currently, the project area along Coast Highway provides unmarked parking, except for a limited number of existing single-space meters. By establishing marked parking spaces throughout the project area, parking safety and accessibility will be improved, consistent with Coastal Act Section 30210. The proposed project would not change any existing conditions related to ADA accessibility. Furthermore, the City-approved pilot program is for a one-year period, which will allow the City to collect additional parking data, which may inform the possibility of establishing dedicated accessible stalls as part of a future action.

Therefore, the Commission finds the contention that the City did not demonstrate the project's compliance with ADA requirements raises no substantial issue with respect to the project's conformance to the certified LCP.

Appellants' Contention No. 7: Adverse Effects

The appellants contend the pilot parking program will result in the following adverse effects if implemented: 1) parking enforcement will be dangerous along Coast Highway; 2) the proposal will result in dangerous Coast Highway crossings from visitors; 3) operational

issues, such as limited pay stations and a lack of cellphone service will create ticket traps and excessive citations; and 4) new parking impacts will arise in adjacent neighborhoods as a spillover effect from visitors who want to avoid the metered parking (**Exhibit 3**). As previously discussed, the grounds for an appeal require an allegation that the development does not conform to the standards set forth in the certified LCP or the public access and recreation policies of the Coastal Act, which are not referenced in the appellants' contentions. Regardless, the pilot parking program is designed to improve safety throughout the project area by establishing demarcated parking.

The City's Planning Commission staff report states that roadway geometry and limited sight distances intensify unsafe conditions throughout the project area, and that marking designated parking spaces will organize roadway space to utilize parking more effectively while improving safety. The City's findings also state that pay station locations were selected based on areas with direct connections to sidewalks and crosswalks to ensure safe access. Furthermore, the City record indicates that parking counts will be finalized based on compliance with the California Department of Transportation standards for safety and line-of-sight within the public right-of-way. The appellants did not provide any evidence to substantiate their claims that the proposal would result in more dangerous conditions than currently exist. Additionally, the approved pay stations accept cash, card, or payment via a mobile app, allowing users to choose from various payment methods. More than half of the proposed parking spaces would remain free, so there is no evidence to suggest the program would create new parking impacts in adjacent residential neighborhoods. Furthermore, private residential parking is not protected under the City's certified LCP or the Coastal Act. In fact, as the appellants point out under the second contention, preferential parking districts in the coastal zone are prohibited pursuant to LUE Policy 5.4. The pilot parking program is only valid for a period of one year, therefore, the City may utilize data from the program to better inform future actions for managing parking throughout the project area.

Therefore, the Commission finds the contention that the pilot parking program will result in parking enforcement issues, dangerous Coast Highway crossings, ticket traps, loss of parking for residents, and new parking impacts in adjacent neighborhoods raises no substantial issue with respect to the project's conformance to the certified LCP.

SUBSTANTIAL ISSUE FACTORS:

The Commission typically applies five factors in making a determination whether an appeal raises a substantial issue pursuant to Section 30625(b)(2).

1. The degree of factual and legal support for the local government's decision that the development is consistent with the relevant provisions of the certified LCP and Coastal Act.

The City's conclusion was adequately supported by sufficient evidence and findings. The City analyzed public access impacts, design compatibility with standardized Laguna Beach parking facilities, environmental justice and conditioned the project to include measures necessary to assure consistency with the certified LCP. The local coastal development

permit contains a high degree of factual and legal support. The appellants have not provided factual evidence supporting inconsistency with the LCP.

2. The extent and scope of the development as approved or denied by the local government.

The scope of the approved development is for the implementation of a one-year pilot parking program along an approximately three mile stretch of Coast Highway. Parking will continue to be provided to visitors and residents throughout the project area, and the program intends to improve safety and efficiency of parking in the area for the duration of the one-year program, which will be used to inform future parking management decisions. Therefore, the scope of the approved development supports a finding that the appeal raises no substantial issues.

3. The significance of the coastal resources affected by the decision.

The only coastal resource at issue affected by the decision is public access to the coast. The City adequately supported the finding that the project will not negatively impact public coastal access and further found that the project does not have any environmental effects, visual resource impacts, habitat impacts or otherwise.

4. The precedential value of the local government's decision for future interpretations of its LCP.

The City thoroughly reviewed and analyzed the project's consistency with the certified LCP. The implementation of a one-year pilot parking program with both paid and free public parking spaces along an approximately three mile stretch of Coast Highway and various residential streets will not set a negative precedent for future interpretations of the certified LCP.

5. Whether the appeal raises local issues, or those of regional or statewide significance.

Efforts to improve parking infrastructure for access to the coast are of local, regional and statewide significance. In this case, the pilot program would last for one year and includes the installation of pay stations and demarcated parking spaces. The results of the program would be used to inform future parking management decisions throughout the project area. The temporary program does not raise issues of regional or statewide significance.

Conclusion

In conclusion, the issues raised by the appellants do not demonstrate that the City's action is inconsistent with the certified LCP. Therefore, staff recommends that the Commission find that no substantial issue exists with respect to the grounds upon which the appeal has been filed.

Appendix A – Substantive File Documents

- Appeal No. A-5-LGB-26-0014 and associated file documents