ORDINANCE NO. 1654

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE APPROVING AN AMENDMENT TO MUNICIPAL CODE TITLE 17 REGARDING REGULATION OF SHORT-TERM LODGING UNITS

WHEREAS, in May 2016 the City Council adopted Ordinances 1622, 1623, 1624 regulating short-term lodgings (the "STLU ordinances"); and

WHEREAS, the STLU ordinances were adopted with the intent of protecting the public's health, safety, and welfare by ensuring neighborhood compatibility through the regulation of commercial, non-residential uses located in residential zones; and

WHEREAS, based on (among other things) the Planning Commission's recommendation, the City Council adopted the STLU ordinances after making findings related to the health, safety, and welfare issues as noted above; and

WHEREAS, when the City Council adopted the STLU ordinances, staff was directed to evaluate the implementation of the STLU ordinances and to report back to the Council after 18 months on whether and how the STLU ordinances might be improved; and

WHEREAS, having implemented the STLU ordinances for a period of time and receiving feedback from residents, visitors, and STLU owners, the City recognizes that the STLU ordinances will better protect the public health, safety, and welfare, and be most compatible with the General Plan if they undergo some revisions; and

WHEREAS, a portion of the City's jurisdiction lies within the Coastal Zone; and

WHEREAS, section 30213 of the California Coastal Act (Pub. Res. Code §§ 30000–30900) states in relevant part, "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred"; and

WHEREAS, the California Coastal Commission has a policy of requiring local agencies to allow visitor-serving lodgings, such as short-term rentals (STLUs and STARs under the STLU ordinances), in the Coastal Zone; and

WHEREAS, City's Coastal Land Use Plan, or "LUP," which was recently certified by the Coastal Commission states that "[i]n addition to hotels and motels, the City's Coastal Zone offers timeshare units for owners and the general public and other short-term vacation rentals in the form of both Short-Term Apartment Rentals (STARs) and Short-Term Lodging Units (STLUs) and 160 camp sites in the Coastal Zone"; and

WHEREAS, Policy LU-49 of the LUP states, "The City shall allow the short term renting (29 days or less) of dwelling units, administratively permitted as Short Term Lodging Units (STLU) or conditionally permitted as Short Term Apartment Rentals

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(STAR), in residential and mixed use zones, subject to appropriate regulations minimizing adverse impacts to neighborhoods or coastal resources. STLUs and STARs shall conform to the requirements of the underlying land use designation, and all standards and laws established by the City"; and

- WHEREAS, the Coastal Act requires the City to implement its LUP through an implementation plan; and
- WHEREAS, some of the City's zoning code is part of the City's coastal implementation plan; and
- WHEREAS, in light of the Coastal Commission's policy toward visitor-serving lodgings, as well as the historical and existing uses of properties in some parts of the Coastal Zone, the City desires to designate more areas in the Coastal Zone than are currently identified in the STLU ordinances as areas where STLUs are allowed; and
- WHEREAS, the City has identified additional properties in the Coastal Zone that are appropriate for STLUs due to their location in the Coastal Zone and the historically compatible uses that have been made of these and surrounding properties; and
- WHEREAS, in addition, in the course of interpreting and enforcing the STLU ordinances, staff identified certain provisions that were not clear from the plain language of the ordinances and need clarification; and
- WHEREAS, the City desires to clarify the interpretation and application of the STLU ordinances; and
- WHEREAS, these amendments do not add any new restriction on tourist-serving short-term lodgings in the Coastal Zone, create any impediment to access to water, change the density or intensity of use of land; or cause any division of land, so these amendments do not result in "development" under the California Coastal Act; and
- WHEREAS, the findings that the City made in support of adopting the STLU ordinances support these amendments and are incorporated here by this reference; and
- WHEREAS, the City Council has considered a wide range of factors in determining what the appropriate amortization period is for nonconforming transitory-lodging uses, including, but not limited to, the following: the typical investment made by an owner, the nature of the nonconforming use, the nature of the neighborhood, the projected cost of relocation, the extent to which properties might be depreciated for tax purposes, whether an transitory-lodging business's good will might be hurt by moving to a new location, the length of a typical lease, and whether another location is available; and
- WHEREAS, the City Council has reviewed and considered the Planning Commission's recommendation, as well as the agenda reports prepared in connection with the STLU ordinances, the Planning Commission's recommendation regarding these amendments, and this ordinance, including the policy considerations discussed therein, and the written and oral testimony received in the pertinent hearings; and

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WHEREAS, in accordance with the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) ("CEQA") and the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), the City has determined that the revisions to the San Clemente Municipal Code are exempt from environmental review pursuant to State CEQA Guidelines sections 15301 and 15061(b)(3) because the revisions relate to the operation, permitting, leasing, and licensing of existing structures, involve no expansion of use or capacity, and it can be seen with certainty that the revisions will not result in a potentially significant physical impact on the environment; and

WHEREAS, all legal prerequisites to the adoption of this ordinance have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE DOES ORDAIN AS FOLLOWS:

Section 1. Recitals.

The recitals above are each incorporated by reference and adopted as findings by the City Council.

Section 2. Findings re CEQA.

The City Council hereby finds and determines that the proposed revisions to the San Clemente Municipal Code are categorically exempt from CEQA under State CEQA Guidelines section 15301, which exempts the operation, permitting, leasing, and licensing of existing structures. Here, the revisions primarily affect the administration of STLUs, in regards to parking, occupancy, amortization of non-conforming use, and management. The revisions do not increase use or capacity of existing structures above what is already permitted by way of existing building codes and land use regulations. No change of use is proposed or allowed. The revisions maintain the status quo for permitting, licensing, and regulation of certain STLUs and STARs within the City. Further, none of the exceptions to use of a categorical exemption identified in State CEQA Guidelines section 15300.2 are present. Specifically, the proposed revisions do not result in damage to scenic resources, do not affect parcels identified as hazardous waste sites or facilities. will not impact historic resources, will not result in significant cumulative impacts, and will not impact uniquely sensitive environments. Finally, no unusual circumstances are present that would bar use of a categorical exemption. The City Council further finds and declares that the proposed revisions to the San Clemente Municipal Code have no potential to result in a significant impact on the environment, due to the revisions' administrative nature, and therefore the revisions are exempt from further environmental review under State CEQA Guidelines section 15061(b)(3). Each of the foregoing exemptions alone exempts the whole of the action.

Section 3. Findings re General Plan Compliance.

The proposed amendments in this ordinance are consistent with the City's General Plan.

A. Land Use Element Primary Goal number 1 states, "The Land Use Plan seeks to retain and enhance established residential neighborhoods, commercial and industrial districts, recreational resources, community-activity areas and amenities, and open spaces that improve the community's quality of life, enhance the appeal of our many attractions, maintain our small-town character, and ensure long-term environmental and fiscal health." The proposed amendments are consistent with this goal because they continue to place reasonable restrictions on short-term-lodging and other transitory-lodging uses to maintain neighborhood character and health.

- B. Land Use Element Primary Goal number 5 states, "The Land Use Plan seeks to preserve and enhance coastal recreation, resources, access and amenities." The proposed amendments are consistent with this goal because they allow for the focused continuation of short-term-lodging uses within close proximity to coastal resources to provide access for visitors.
- C. Land Use Element Policy LU-1.01, General, states, "We accommodate the development of a variety of housing types, styles, tenure and densities that are accessible to and meet preferences for different neighborhood types (e.g., mixed use pedestrian environments and traditional suburban neighborhoods), physical abilities and income levels, pursuant to the Land Use Plan and Housing Element." The proposed amendments are consistent with this policy because they allow for the maintenance of a diverse spectrum of housing opportunities, including affordable low- and medium-density residential neighborhoods, while permitting commercial lodging uses and transitory-lodging facilities that are compatible with residentially-focused neighborhoods.
- D. Land Use Element Policy LU-2.03, Neighborhood Compatibility, states, "We require that commercial projects abutting residential neighborhoods be designed and operated to protect residents from the effects of noise, light, odors, vibration traffic, parking and other operational impacts." The proposed amendments are consistent with this policy because short-term lodging units, being taxed similarly to hotels, motels, and other commercial lodging units, are by definition not residential projects, and the proposed amendments preserve the City's current requirement that these commercial lodging uses maintain compatibility with surrounding residential neighborhoods and not exceed limits to the density of short-term lodging units and transitory lodging facilities within those neighborhoods.
- E. Land Use Element Policy LU-3.05, Stand Alone Residential Uses, states, "In Mixed Use areas MU3.1, MU3.3, and MU5, stand-alone residential uses are permitted. In these areas, we require stand-alone dwellings to be compatible with adjacent commercial and mixed uses and with adjacent neighborhoods...." The proposed amendments are consistent with this policy because they continue to permit commercial lodging uses that could

- occupy stand-alone residential structures and contribute more to a mixed-use zone than residential uses.
- F. Land Use Element Policy LU-10.16, Residential Buffers, states, "While entertainment and cultural uses are focuses of the [North Beach] Area's revitalization, we require new development to be compatible with nearby residential uses through horizontal distance requirements and building and site design standards established by the Zoning Ordinance and Specific Plan." The proposed amendments are consistent with this policy because they continue to encourage short-term lodging uses to locate within mixed-use, visitor-serving areas which help provide a buffer between more intense commercial uses and less intense residential neighborhoods.
- G. Land Use Element Policy LU-11.03, Flexibility, states, "We allow flexibility to accommodate market changes for the mix of uses identified in the Del Mar/T-Zone Mixed Use Guide, if doing so promotes achieving the Area's vision and improves livability, reduces vehicular trips, creates community gathering places and activity nodes, or helps strengthen the its character and identity." The proposed amendments are consistent with this policy because they continue to provide for the enhancement of that area's visitor-serving focus and provides opportunities for commercial lodging within close proximity to activity nodes.
- H. Land Use Element Policy LU-12.07, Economic Development, states, "We leverage Del Mar/T-Zone and Pier Bowl and Pier economic development efforts and special events to enhance regional appeal and encourage visitors to visit both destinations. The City will support efforts to develop tools that aid in the Area's revitalization." The proposed amendments are consistent with this policy because they continue to permit short-term-lodging uses within the Pier Bowl and Del Mar/T-Zone Focus Areas, which encourages the visitation and revitalization of both areas due to the attractiveness of STLUs to visitors.
- I. Economic Development Policy ED-1.04, Long-Term Benefits, states, "We consider long-term benefits, not just short-term returns, in our decision-making processes." The proposed amendments are consistent with this policy because they continue to strike the balance necessary to ensure the long-term attractiveness and viability of the City's residential neighborhoods with the ability to generate more tax revenue at their expense.
- J. Coastal Element Policy C-1.14, Overnight Accommodations, states, "We protect, encourage and, where feasible, provide low cost overnight accommodations in the Coastal Zone, including the possibility of a youth or elder hostel." The proposed amendments are consistent with this policy because they continue to provide for the continuation of visitor-serving short-term lodging accommodations within the Coastal Zone.

Section 4. Findings re Public Health, Safety, and Welfare.

The proposed amendments will not adversely affect public health, safety, or welfare. In addition to the facts articulated in the recitals to this ordinance and the findings in the STLU ordinances, all of which are incorporated herein by this reference, the City Council also finds that the proposed amendments in this ordinance will not adversely affect public health, safety, or welfare, in that the proposed amendments achieve the goals of the General Plan as stated in the staff report and in Section 3 above. Additionally, the proposed amendments ameliorate the negative impacts created by short-term-lodging uses on traditional neighborhood settings by appropriately restricting short-term-lodging uses to maintain residential neighborhood compatibility. The proposed amendments also mitigate negative impacts created by non-residential commercial uses in residential zones. The proposed amendments continue to limit lodging uses in residential zones to the extent necessary to maintain compatibility with traditional neighborhood environments, while also limiting the potential for lodging uses to expand into areas of the City that are less appropriate. The proposed amendments also protect land uses in the coastal zone by ensuring that the STLU ordinances comply with the requirements of the Coastal Commission and the City's LUP. Finally, the proposed amendments protect the public health, safety, and welfare by appropriately balancing residential compatibility concerns with private property rights.

<u>Section 5.</u> SCMC section 17.16.145 Short-term Lodging Unit (or STLU) Zoning Permit, subsection (A) Purpose and Intent, is amended to read in its entirety as follows:

A. Purpose and Intent; Zoning Permit Required. The STLU zoning permit process prescribed in this chapter is to provide for a more expeditious and streamlined review and approval procedure for STLUs that are consistent with the standards of this title. An STLU zoning permit is required to operate an STLU.

Section 6. SCMC section 17.16.145 Short-term Lodging Unit (or STLU) Zoning Permit, subsection (E) Recordation, is amended as follows:

The phrase "CITY'S RIGHT TO NOTICE OF CHANGE IN OWNERSHIP" is replaced with "REQUEST FOR NOTICE AS AUTHORIZED BY CIVIL CODE SECTION 2924b, SUBD. (a)."

Section 7. SCMC section 17.16.145 Short-term Lodging Unit (or STLU) Zoning Permit, subsection (G) Modifications Requested by Applicant, is amended as follows:

The phrase "Modifications of an Approved Application" is replaced with "Applicant Requests to Change Approved Applications."

<u>Section 8.</u> SCMC section 17.16.146 Short-term Apartment Rental Permit, subsection (A) Purpose and Intent, is amended to read in its entirety as follows:

A. Purpose and Intent; STAR Permit Required. It is the purpose of the Short-term Apartment Rental ("STAR") permit process to provide for the

streamlined review of uses that may have an impact on the surrounding environment and require discretionary review, but due to their nature, scale or location do not require discretionary consideration by the Planning Commission. The STAR permit process has as its purpose the same goals for uses described for the Minor Conditional Use Permit process included in Section 17.16.060A. Conditional Use Permits Purpose and Intent of this chapter, with the exception of the owner-specific nature of the permit not running with the land. A STAR permit is required to operate a STAR.

Section 9. San Clemente Municipal Code (SCMC) section 17.28.292, subsection (C)(9), is amended by deleting "d" thereof.

<u>Section 10.</u> San Clemente Municipal Code (SCMC) section 17.28.292 Short Term Lodging Units, subsection (C)(11), is amended to read in its entirety as follows:

11. Occupancy Limit. The maximum number of renters and guests in an STLU may not exceed two persons per legal bedroom plus two persons, but in no event may the maximum occupancy of any STLU exceed 10 or the maximum allowed under Title 15 of the code, whichever is lower; provided, however, that dwelling units with five or more legal bedrooms may apply to the Community Development Director for a waiver of the 10-person occupancy limit, which the Director may approve, conditionally approve, or deny based on reasonable and objective criteria. The Community Development Director's decision on a waiver of the 10-person occupancy limit is discretionary but shall not be unreasonably withheld. The Director shall establish reasonable and objective criteria, based upon legal bedrooms, for evaluating the 10-person waiver requests and shall submit the criteria to the City Council for adoption by resolution. The criteria may be amended by resolution. The STLU owner shall by written agreement with the renter limit overnight occupancy of the STLU to the maximum number of guests.

Section 11. SCMC section 17.28.292 Short Term Lodging Units, subsection (C)(12), is amended as follows:

The reference to "17.28.292C.5" is deleted and replaced with "17.28.292(C)(5)."

The reference to "17.28.292C.11, Occupancy Limit and Parking" is deleted and replaced with "17.28.292(C)(11), Occupancy Limit."

Section 12. SCMC section 17.28.292, subsection (D), is amended to read in its entirety as follows:

D. Additional Operational Standard for STARs. In addition to the operating standards for STLUs specified in subsection (C) of this section, the following operating standard applies to STARs: A STAR owner or the owner's trained and qualified property manager must operate the STAR and must sleep within a habitable room in a unit on the property every night that a unit in

the STAR is rented for short-term lodging purposes. The Director of Community Development shall develop reasonable and appropriate standards for property-manager training and qualification and shall submit them to the City Council for adoption by resolution. The standards may be amended by resolution.

Section 13. SCMC section 17.28.292, subsection (E)(2), is amended to read in its entirety as follows:

2. The number of STLUs excluding STARs, in any STLU Allowed Area, as reflected in the STLU Allowed Areas maps in Appendix C of this Title, shall be limited to a maximum of 20 percent of the total housing units within each STLU Allowed Area, as reflected in the STLU Allowed Areas maps in Appendix C of this Title.

Section 14. SCMC section 17.28.292, subsection (F), is amended to read in its entirely as follows:

F. Additional Development Standards for STARs. In addition to the development standards for STLUs specified in Subsection E of this section, the following development standard applies to STARs: A STAR must be located at least 300 feet from every other STAR or STLU. This distance shall be measured by following a straight line without regard to intervening buildings from the nearest point of the parcel on which the proposed STAR is to be located to the nearest point of the parcel from which the proposed STAR is to be separated. In a situation where two STARs would be located on the same legal parcel in separately owned structures, the distance shall be measured by following a straight line from the nearest point of the portion of the enclosed building in which the proposed STAR is to be located to the nearest point of the enclosed building from which the proposed STAR is to be separated.

<u>Section 15.</u> SCMC section 17.32.030 Residential Use Regulations, Table 17.32.030, footnote 20, is amended to read in its entirety as follows:

²⁰ STLUs are only permitted on lots that are designated for STLUs on the City's current adopted "Short-Term Lodging Units (STLU) Allowed Areas" map in Appendix C of this Title.

Section 16. SCMC section 17.72.060 Nonconforming Use Restrictions, subsection (G)(1), is amended to read in its entirety as follows:

- STLUs and STARs.
 - a. Generally. Any residential use that was legally established and legally operating as of February 2, 2016 (including any legitimate legal and appropriately licensed home occupation and any other legitimate and legal incidental and accessory commercial use) but

that is categorized by the provisions of this Title as a Short-term Lodging Unit ("STLU") or Short-term Apartment Rental ("STAR") and does not conform to the development standards of Subsections 17.28.292E. and F. is subject to an amortization period of two years, or until the sale or transfer of the property whichever occurs first, as long as that STLU or STAR is operated according to the operational standards of Subsections 17.28.292(C) and (D) with a valid STLU operating license under Chapter 3.24 and in accordance with other local, state, and federal law.

- b. Notwithstanding subsection (G)(1)(a) above, the owner of an STLU outside of the RVL and RL zones may, if the owner is in good standing, extend the two-year amortization period to ten years by submitting a complete, written application to extend the amortization period on a form provided by the Director of Community Development within 30 days after -the Director makes extension application forms available to the public. "In good standing" here means: current on remittance of STLU TOT to the City and with no violation of the City's municipal code, including the TOT ordinance, that was not cured within 30 days of the notice of violation. The Director's decision on amortization-extension applications is ministerial.
- c. Any amortization extension granted under subsection (G)(1)(b) above constitutes a use permit that is specific and personal to the STLU owner and does not run with the land, and it terminates upon any sale or transfer of the STLU property as defined in subsection (G)(3) below.

<u>Section 17.</u> SCMC section 17.72.060 Nonconforming Use Restrictions, subsection (G)(4), is amended to read in its entirety as follows:

4. Amortization Extension.

- a. Eligibility. The owner of (i) a legal nonconforming STLU or STAR in an RVL or RL zone or (ii) a legal nonconforming boarding house in any residential zone may apply for an extension of the amortization period by making a written request to the Community Development Director. (Legal nonconforming STLUs and STARs in other residential zones are subject to a different amortization process under subsection (G)(1)(b).)
- b. Timing. Such request shall be made before the amortization period ends unless the Community Development Director determines that good cause is shown for late submission of the request.
- c. Hearing Officer. A timely request for an extension of the amortization

period shall be heard by a neutral third-party hearing officer within 30 days of receipt of the request. The party requesting the extension shall pay the costs of the hearing, including the cost of the hearing officer, and shall deposit funds sufficient to cover those costs when the written request for extension is submitted to the City.

- d. Criteria. A request for an extension of the amortization period shall only be issued if the property owner demonstrates to the hearing officer's satisfaction that the specified amortization period is unreasonably short and that an extension is in fact necessary to avoid a constitutional taking. Factors may include, but are not limited to, the extent of the particular owner's investment that is unique to the non-conforming use and does not serve any conforming use of the property, the extent of the owner's investment that will not be recovered on sale of the property the owner's investment-backed expectations in light of current and pending regulation at the time that the investment was made, replacement cost of improvements that might have been made that only serve the nonconforming use, and the length of time that the owner has had the benefit of the investment before the use became nonconforming.
- e. Burden. The burden is on the owner to demonstrate that the general two-year period is unreasonable in the owner's particular case.

<u>Section 18.</u> A new Appendix C for "Subject-specific Maps" is added to Title 17 of the Municipal Code. A copy of the appendix is included as **Exhibit A** to this ordinance. The appendix includes a "Short-Term Lodging Units (STLU) Allowed Areas" map. Other subject-specific maps may be added to the appendix in the future.

Section 19. All existing provisions of the Municipal Code that are repeated herein are repeated only to aid decision-makers and the public in understanding the effect of the proposed changes. Restatement of existing provisions does not constitute a new enactment.

<u>Section 20.</u> If any provision of this ordinance or its application to any person or circumstance is held invalid, such invalidity has no effect on the other provisions or applications of the ordinance that can be given effect without the invalid provision or application, and to this extent, the provisions of this ordinance are severable. The City Council declares that it would have adopted this ordinance irrespective of the invalidity of any portion thereof.

<u>Section 21.</u> The City Council hereby directs staff to prepare, execute, and file with the Orange County Clerk, a Notice of Exemption within five (5) working days of the approval of this Ordinance.

Section 22. The City Clerk shall certify to the adoption of this ordinance and cause it, or a summary of it, to be published once within 15 days of adoption in a

newspaper of general circulation printed and published within the City of San Clemente, and shall post a certified copy of this ordinance, including the vote for and against the same, in the Office of the City Clerk in accordance with California Government Code section 36933.

<u>Section 23.</u> The documents and materials associated with this ordinance that constitute the record of proceedings on which the City Council's findings and determinations are based are located at San Clemente City Hall, 100 Avenida Presidio, San Clemente, CA 92672.

<u>Section 24.</u> To ensure that there is no ambiguous overlap or gap in regulation, this ordinance takes effect either (a) 30 days after adoption or (b) on June 17, 2018, whichever is later.

APPROVED AND ADOPTED t	his <u>15th</u> day of <u>May</u> , <u>2018</u>
	Mayor City of San Clemente, California
ATTEST:	
City Clerk City of San Clemente, California	

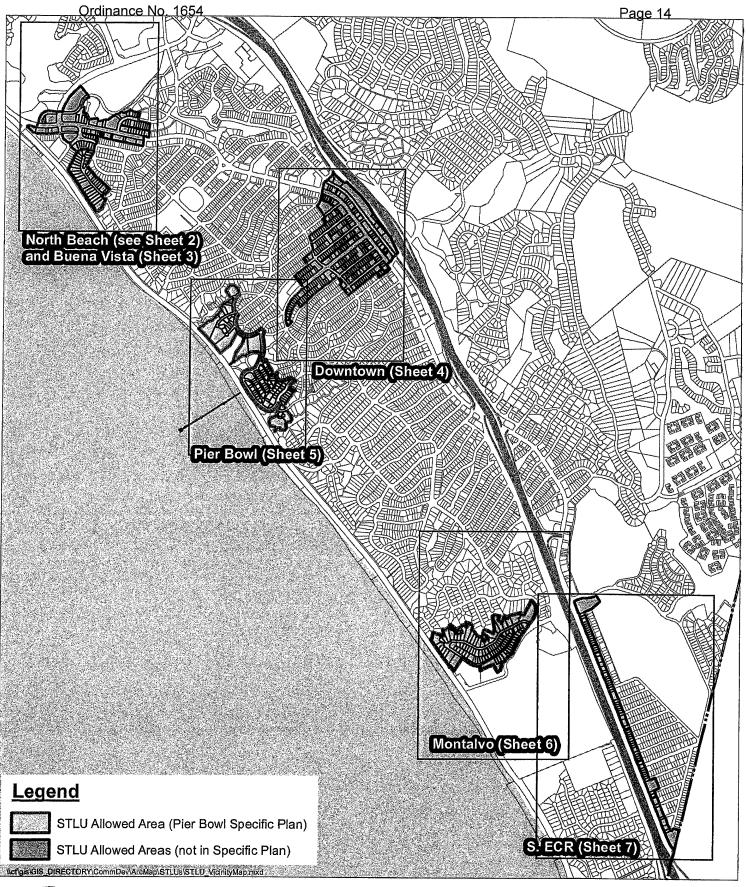
COUNTY OF ORANGE) ss. CITY OF SAN CLEMENTE)
I, JOANNE BAADE, City Clerk of the City of San Clemente, California, hereby certify that Ordinance No. $\underline{1654}$ having been regularly introduced at the meeting of $\underline{May 9, 2018}$, was again introduced, the reading in full thereof unanimously waived, and duly passed and adopted at a regular meeting of the City Council held on the $\underline{15th}$ day of \underline{May} , $\underline{2018}$, and said ordinance was adopted by the following vote:
AYES:
NOES:
ABSENT:
IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this day of,
CITY CLERK of the City of San Clemente, California
APPROVED AS TO FORM:
CITY ATTORNEY

Exhibit A

APPENDIX C

Subject-specific Maps

Map 1 "Short-Term Lodging Units (STLU) Allowed Areas"	
Sheet 1	"Short-Term Lodging Units (STLU) Allowed Areas" Vicinity Map (Ord. No. NNN); Ord. 1622, SEC. 9 and 10.)
Sheet 2	"Short-Term Lodging Units (STLU) Allowed Areas – North Beach" (Ord. 1622, SEC. 9 and 10.)
Sheet 3	"Short-Term Lodging Units (STLU) Allowed Areas – Buena Vista" (Ord. No. NNN); Ord. 1622, SEC. 9 and 10.)
Sheet 4	"Short-Term Lodging Units (STLU) Allowed Areas – Downtown" (Ord. 1622, SEC. 9 and 10.)
Sheet 5	"Short-Term Lodging Units (STLU) Allowed Areas – Pier Bowl" (Ord. 1622, SEC. 9 and 10.)
Sheet 6	"Short-Term Lodging Units (STLU) Allowed Areas – Montalvo/Lobeiro" (Ord. No. NNNN; Ord. 1622, SEC. 9 and 10.)
Sheet 7	"Short-Term Lodging Units (STLU) Allowed Areas – S. ECR" (Ord. 1622, SEC. 9 and 10.)

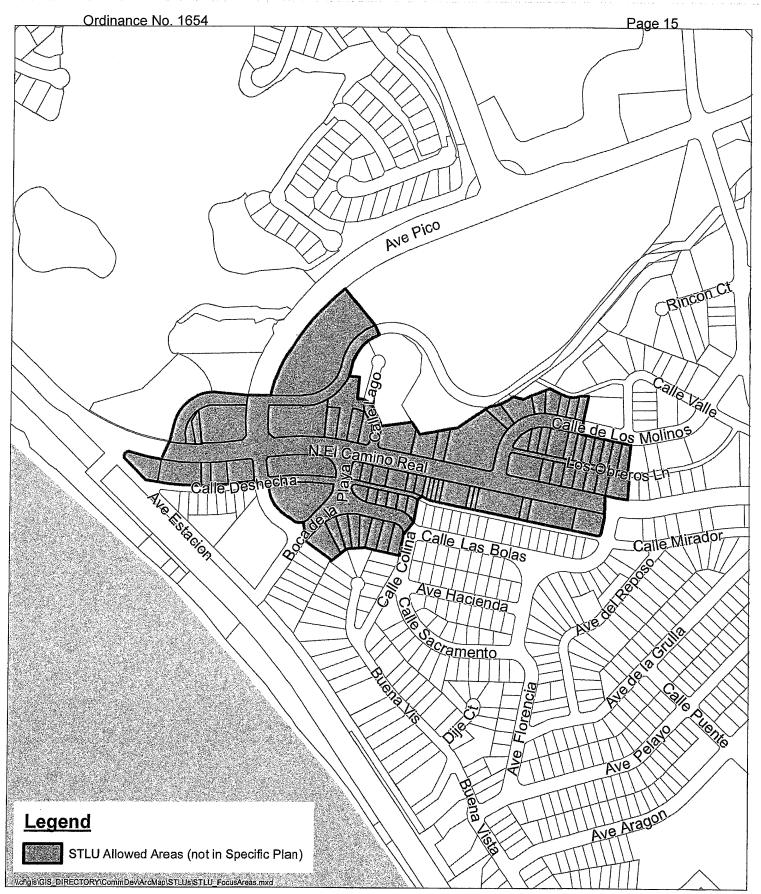




Sheet 1 - Short-Term Lodging Units (STLU) Allowed Areas - Vicinity Map



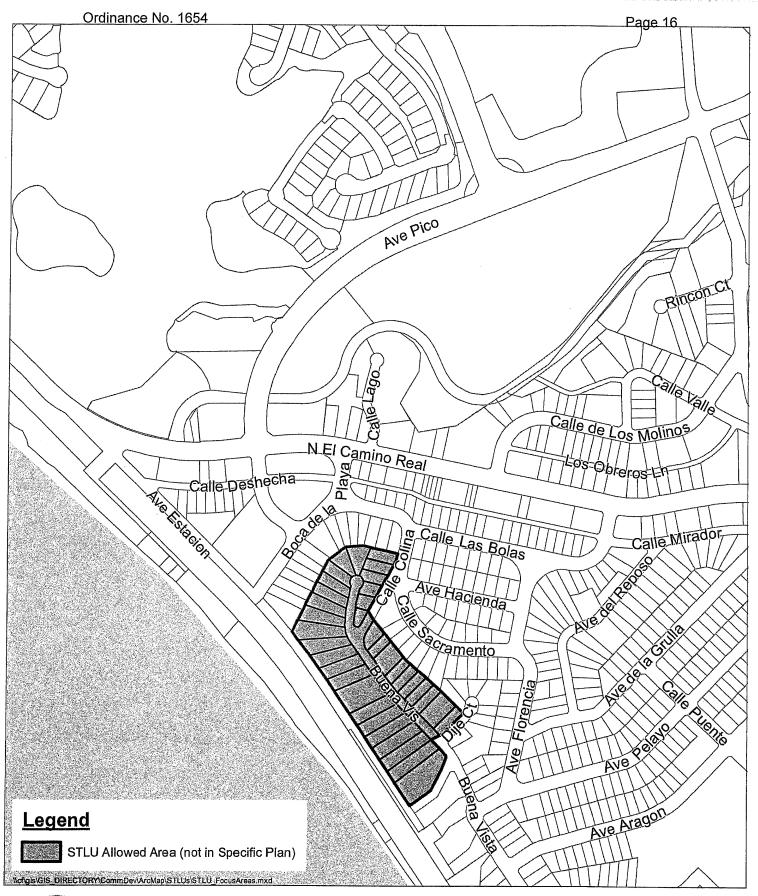
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Sheet 2 - Short-Term Lodging Units (STLU) Allowed Areas - North Beach







Sheet 3 - Short-Term Lodging Units (STLU) Allowed Areas - Buena Vista



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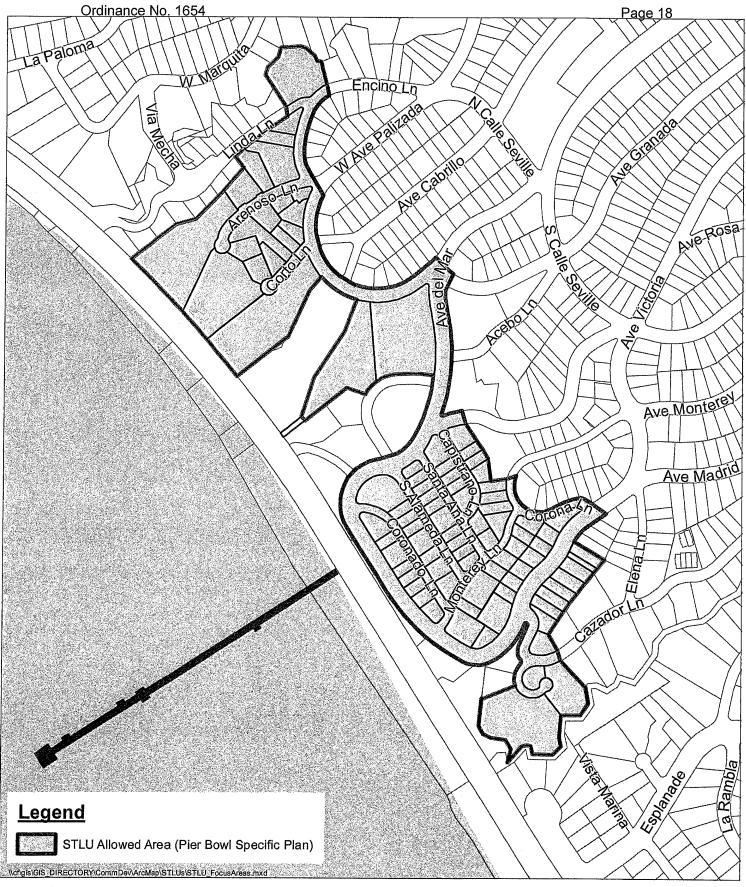




Sheet 4 - Short-Term Lodging Units (STLU)
Allowed Areas - Downtown

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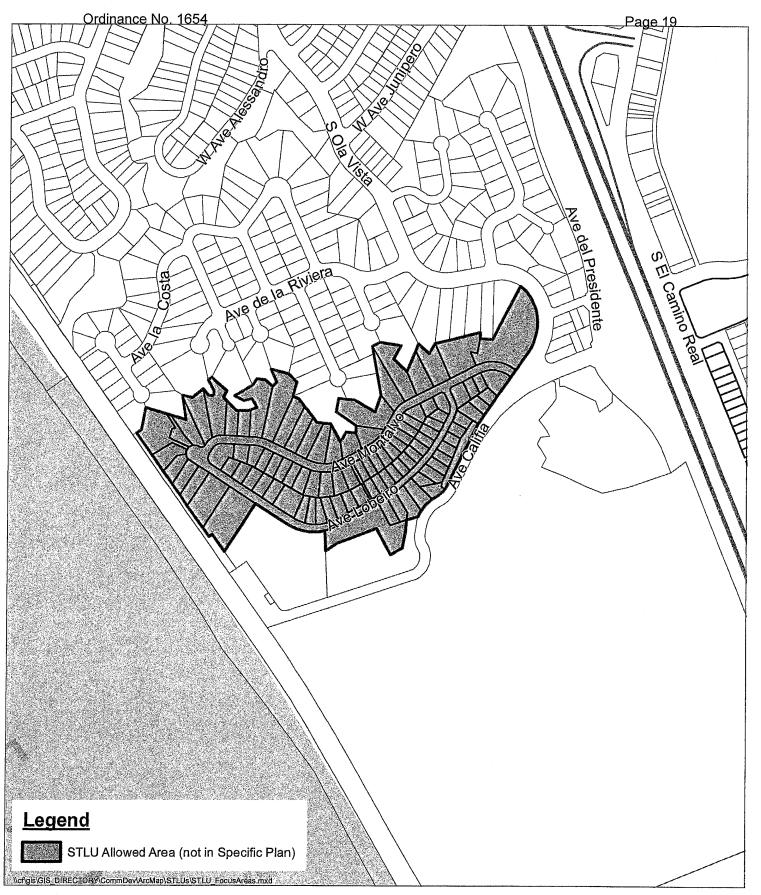




Sheet 5 - Short-Term Lodging Units (STLU) Allowed Areas - Pier Bowl

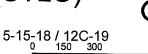


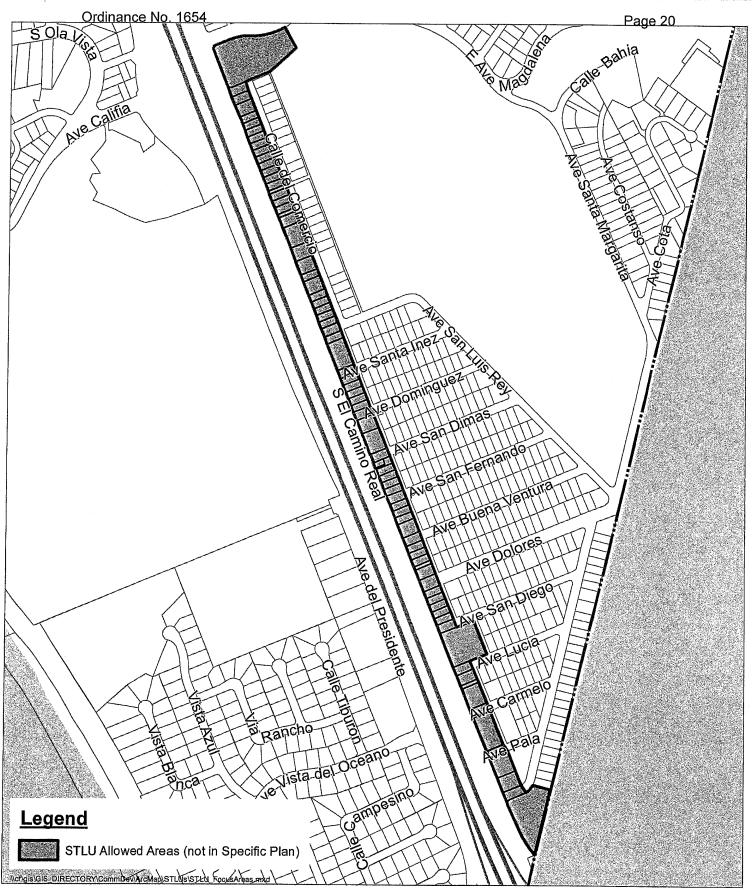
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Sheet 6 - Short-Term Lodging Units (STLU) Allowed Areas - Montalvo/Lobeiro







Sheet 7 - Short-Term Lodging Units (STLU)
Allowed Areas - S. ECR

5-15-18 / 12C-20



700 Feet