CMC 14.78.040: Amended Appeal to the City Council
Planning Commission Approval of Surfliner Inn Project: Oct 5, 2026
Project Number: 23-2254-DP/CUP/CDP/ARB
Parcel No. 004-105-011 & 004-105-026
Location: 399 & 499 Linden Ave. Carpinteria, CA 93013
Appellants: Alan and Carol Koch

Appeal Scope:

This project proposal is not only about the Surfliner Inn on Lot #3; but, also includes the critical off-site improvements:

- Reconfiguration of Lot #3.
- **Proposed new Lot #4 across the tracks bordering the Beach Neighborhood.**

The City is authorized to lease City public property to commercially develop public land as long as a viable replacement parking lot is built to accommodate the lost spaces:

- **Authorized by Government Code Section 37395, among other Government Code sections, subject to the finding that the underlying property is not required for other City purposes.**

Appeal A: Grounds for appeal on the Planning Commission (PC) decision to approve Lot #4 Alternative 5 as a viable replacement parking lot for the downtown business district, Amtrak and beach public parking lot:

- **Based on the incompleteness of the Staff Report not being in accord with the with the purposes of the General Plan (GP) Objectives and Policies.**
- **Planning Commissioners incomplete deliberations that did not cover all the elements of this project: Development Plan (both hotel and Alternative 5 for Lot #4) and the Conditional Use Permit for Conjunctive Parking that is the totality of the project.**

This resulted in an error of discretion by the Planning Commission to make a complete set of decisions based on the specific facts of the entire project.

Appeal B: Grounds for appeal is based on the incompleteness and inconsistencies of Attachment C: Conjunctive Parking Analysis and Justification prepared by Associated Transportation Engineers (ATE), September 2026:

- **Hotel guest demand happens during the same time of the day as daily users.**
- **Inadequate existing lot daily visitors usage (from Walker Study) and projections for Linden Square and Palms.**
- **Recent new hotel usage for rooftop special events (+/-) 100 attendees.**

With many variables going into estimating projected demand on conjunctive public parking lots recommending additional wording in the Project Conditions of Approval.

Appeal A: Omitted 'Findings' from Staff Report and PC Deliberations and Approval:

Attachment A. Exhibit 1: Section 5.0. Conditional Use Permit Findings - Conjunctive Parking b. (page 50): **"The site for proposed use is served by streets and highways that are properly designed to carry the type and quantity of traffic generated by the subject use."**

'The Community Design Element of the GP introduction describes the physical characteristics that contribute to Carpinteria's unique identity and appearance. The town of Carpinteria is a variety of individual neighborhoods with unique scale and character of streets and other public places' (pg 31).
'Residential Neighborhoods are generally composed of quiet interior areas of single or multi-family residential uses. Neighborhood interiors are intended to provide a quiet, safe and family-oriented environment' (GP 32).

A. I. Finding: GP Community Design Element Inconsistencies with Lot #4 Exit Onto Elm.
These inconsistencies were not provided to the Planning Commissioners since the Staff Report under section V. Policy Analysis did not include or provide any analysis/ comments: Therefore, the PC never commented on or deliberated the following residential neighborhood Objectives:
- Objective CD-5: The streets of neighborhood interiors should be designed to be the "living rooms" of the neighborhood, where children and adults can safely play or walk.
- Objective CD-9: To ensure that streets enhance the established city framework and design.
- Objective CDS1-2: Enhance the pedestrian character of the neighborhood street.

A.II. Finding: Inadequate Street Types:
The Beach Neighborhood interior streets around the proposed Elm street exit are classified as right of way Local Streets in the GP Circulation Element (page 75): narrow traffic pavement with no curbs/sidewalks/street parking on pavement. Local streets are designed to serve individual neighborhoods within residential areas. They are inappropriate for use in non-residential land use areas, due to their lack of adequate width of parking and travel lanes..

- **Not as a public parking lot exit thoroughfare –**

A.III.a. Findings: Inadequate GP Objectives/ Policies and Municipal Code Ordinances for Parking Lot Design Standards (i.e. "Public Works does not have adopted parking lot design standards" per Matt Roberts social media post);
Design standards for efficient and safe traffic movement:

- Interior layout of parking spaces and aisles (CMC has parking space size and aisle width requirements).
- Number of required ingress/egress as to number for downtown lots vs city parks/beach lots to limit interior parking lot congestion.
- Exits onto developed Collector Streets for more efficient traffic flow leaving the Downtown Neighborhood.

A.III.b. Findings: Inadequate Design Standards for Lot #4, Alternative 5:

All current large downtown parking exits in Lots #1 and #3 have several design standards that were not analyzed as part of the Staff consistency review which illustrates 'best practices' for design standards of Downtown T parking lots::

- Have multiple entrances/ exits.
- Exit directly onto larger width Collector Streets that border a residential neighborhood
- Collector Streets have wider Right of Way (ROW) with fully developed curbs/ sidewalks/ street parking.
- Two or more exits provide more options to reach Collector Streets to Carpinteria Avenue to leave the downtown area.

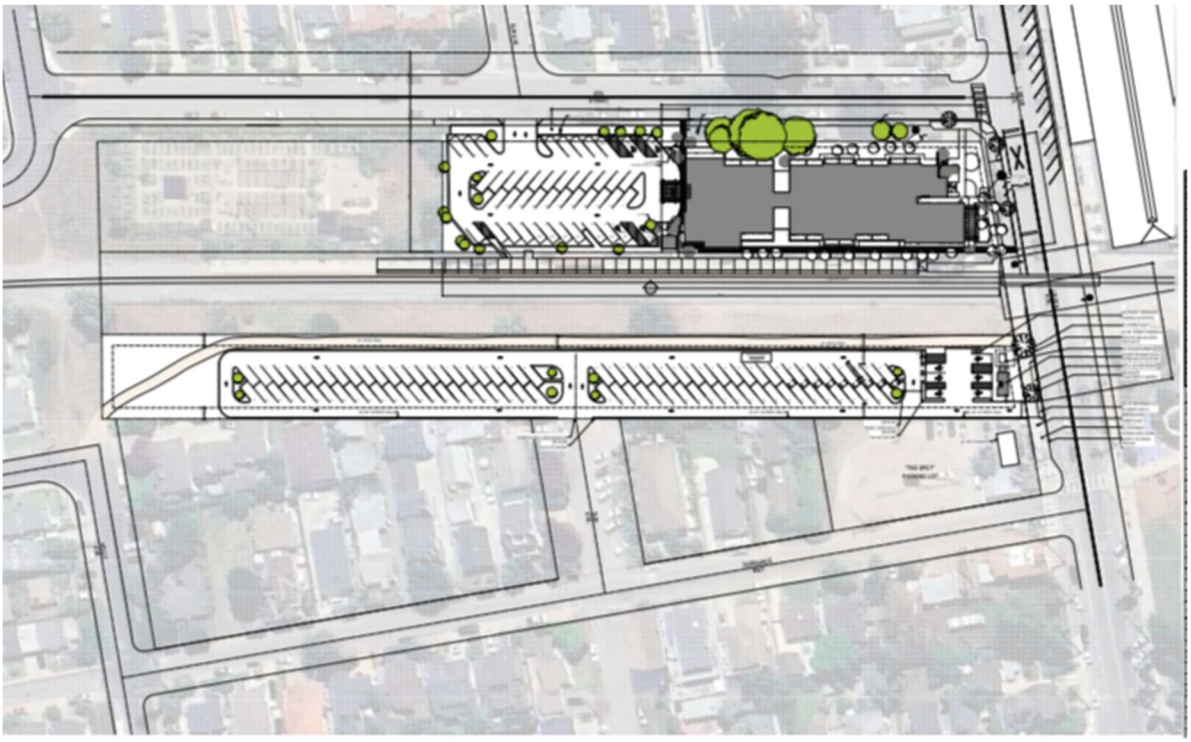
- PROVIDES A BUFFER BETWEEN PEDESTRIANS AND TRAFFIC-

There are several design standards in Lot #4, Alternative 5, that the City is proposing that do not reflect 'best practices' of existing downtown parking lots:

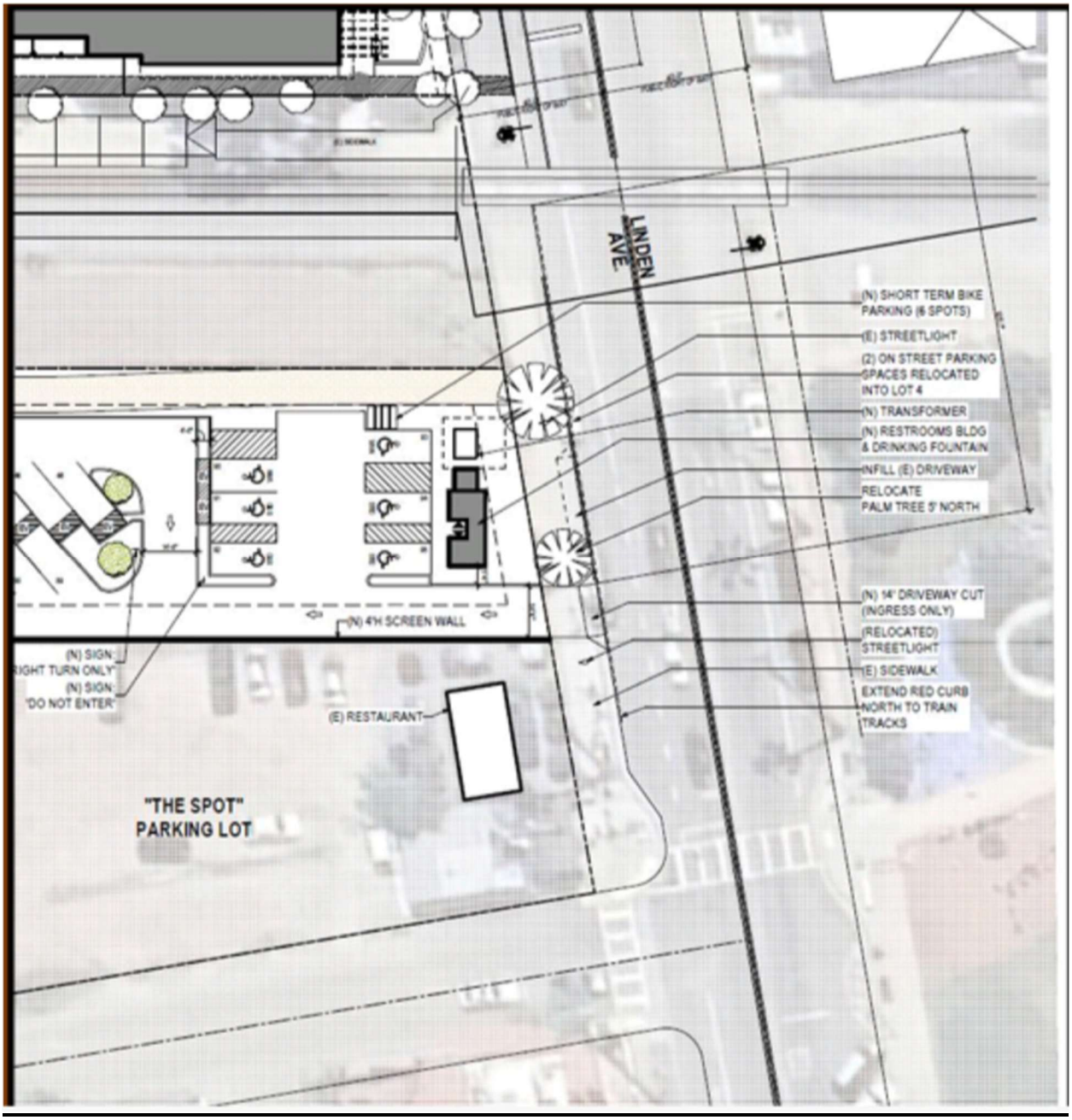
- Lot #4 has only one single entrance and another single exit.
- Single exit directly into a residential neighborhood.
- Exit onto a Local Street: narrow with no curbs/ sidewalks /street parking.
- Single exit onto a residential neighborhood Local street provides only one way to reach Linden Ave; and, then cross over the tracks to Collector Streets to Carpinteria Avenue to leave the downtown area.

- NO BUFFER PROVIDED BETWEEN PEDESTRIANS AND TRAFFIC-

Lot #4: Alternative 5



Enlarged Image of the entrance to Lot #4. Alternative 5 and the Linden Ave from railroad crossing to the Dorrance intersection:



A.IV. Finding: Entrance Location Inadequacy per Industry Best Practice Standards and GP Circulation Element Policies:

The Staff recommended and PC approved entrance to Lot #4 is accessed from Linden Avenue, on the smallest block on Linden:

- Entrance on a major thoroughfare.
- Close proximity to the railroad crossing gates and Dorrance intersection.

Potential to create conflict points between vehicles/ pedestrians/ bicyclists on busy summer season days or major City event days.

The Institute of Transportation Engineers (ITE) issues standards for entrances to downtown parking lots:

To safely manage entrance queues to ensure cars do not back up onto the railroad tracks during heavy usage days:

- Entrance driveways should ideally not be placed within **200 to 250 feet** of a crossing on major roads. Lot # 4 driveway is approximately **107 feet** from UPRR tracks.
- Adequate parking lot driveway length before reaching the first internal parking space at least 40 feet from the public street curb: Internal Stacking Area. Confirmed that the plans show 45'-9":
    - But, there is an awkward placement of a 6 space handicap section at the front of the entrance with a dead end and 90 degree spaces. Totally different traffic flow that potentially can create a high potential conflict point of causing additional queuing into the lot onto Linden.

ITE also issues standards for location for entrances and intersections:

- Driveways should also be placed as far from intersections as practical (i.e.Dorrance).

GP Inconsistency with CD-14-Implementation Policy 10: Design of parking facilities shall take into consideration in addition to intended use, the layout of entrances and exits so as to avoid concentrations of cars or excessive idling (GP pg 29).

GP Inconsistency with Circulation Element Objective C-6: Provide adequate safe railroad crossings.

Common regulatory guidelines suggest a Traffic Impact Analysis (TIA) should be conducted for the block on Linden where the entrance is located to see how entering the parking lot affects Linden between the railroad crossing and Dorrance intersection during the peak usage days. The Applicant's Traffic Study references concern that the City's Public Works or Community Development Departments did not request a TIA from the developer.

Appeal A: Summary Appeal Conclusion and Requested City Council Action:

Suggest that the City Council conditionally approve the Appeal 'that Lot #4, Alternative 5, is not a viable replacement for a parking lot that serves both the downtown businesses, Amtrak and the beach visitors:

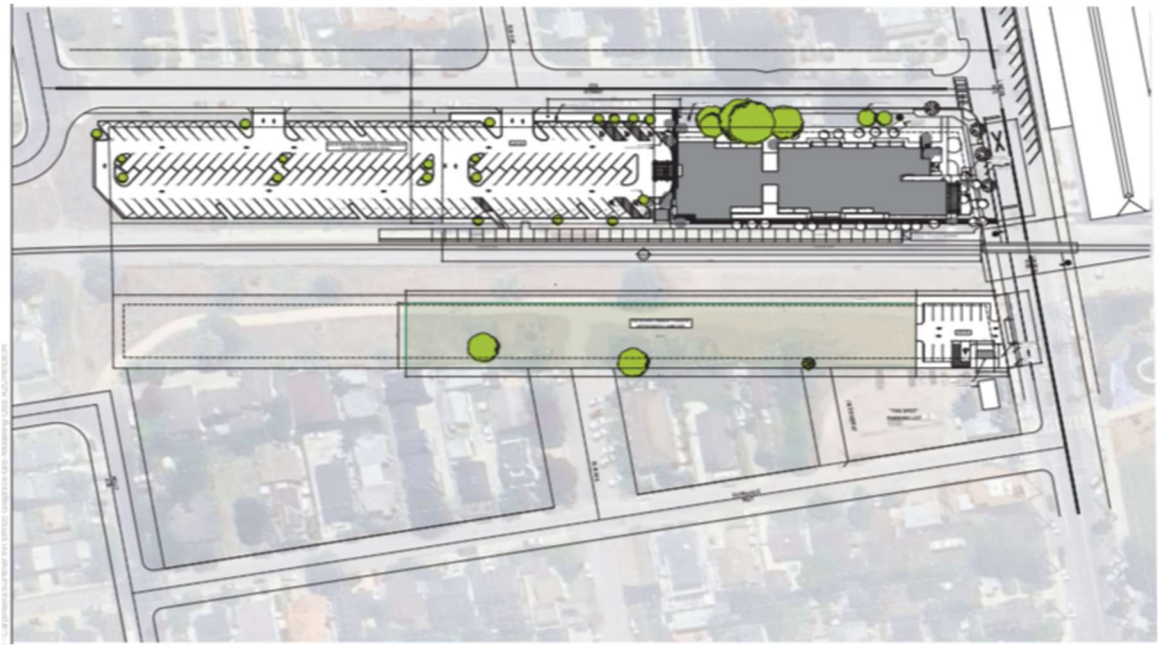
- **Accept the above findings of an incomplete Staff GP consistency review of utilizing a Local street type in a residential neighborhood as an exit thoroughfare for a public parking lot.**
- **Accept the above finding of 'best practices' for the design standards of a parking lot.**
- **Accept the above finding of inadequate entrance location on Linden Avenue**

The Beach Neighborhood has a unique classification of street type for a reason to support the qualities of that neighborhood. The character of the street is designed for pedestrian safety and not the introduction of vehicles exiting a public parking lot and increasing traffic flow impacts during high usage days: 25 to 30 busy days of holidays, summer vacations, special City events.

- BASIC PRINCIPLE OF THE GENERAL PLAN THAT SHOULD NOT BE COMPROMISED-

Ask the Staff to return with additional analysis on Alternative 3 from the final EIR: move the Community Garden across the tracks and extend the reconfigured Lot #3 to Holly:

- **Downtown and Beach parking remains north of the tracks in the Downtown T.**
- **Extending Lot #3: Provides two access points to the Amtrak platform. Location north of RR crossing easier access for hotel guests and businesses in the southern portion of the Downtown T.**
- **A superior EIR impact to Lot #4, Alternative 5.**



Appeal B: Attachment C: Conjunctive Parking Analysis and Justification
Incompleteness of Analysis and Inconsistent Conclusions

Lot #3 and #4: Proposed Inventory of Available Spaces
(Amended Version)

	Standard Spaces	Designated Assessible	EV Spaces	Total
Proposed:				
Lot #3	40	2	4	46
Lot #4	83	4	8	95
	123	6	12	141
Current:				
Lot #3	107	6	0	113
Increase	16	-	12	28

B.I. Finding: The reference to an additional 28 parking spaces under Lot #4 Alternative 5 in all Staff documents comes with a caveat of restricted parking spaces:

A simple supply and demand analysis of the proposed increase in supply of Standard Spaces shows a potential major shortfall in the number of parking spaces on high demand summer time or major City events:

- Sharing of EV spaces is very different since they are restricted.
- So the Standard Spaces for sharing among existing public parking demand and new demand generated by the Surfliner equates to 16 additional spaces. A 15% increase in spaces.
- On those high occupancy parking demand days where current Lot #3 is full; there are only 16 more spaces for the Surfliner usage. Or, if the estimated Surfliner demand of 41 to 56 spaces in those high occupancy days happen; there are 25 to 40 existing public parking users that will need to find parking elsewhere on the streets.

One of the Conditions for approval is a Conjunctive Parking Agreement (CUP Requirement): Establishing the terms and conditions governing the shared use of City Parking Lots #3 and #4 for public and hotel-related parking (Attachment A. Exhibit 3. Project Conditions of Approval, pg 4).

Attachment C. Conjunctive Parking Analysis and Justification study by Associated Transportation Engineers (ATE):
- The report's Shared Parking Analysis (starting pg 5) uses the Urban Land Institute (ULI) Shared Parking Model to evaluate the forecasted peak parking demand during typical summer weekday and weekend conditions.
- The conjunctive parking program recognizes that the hotel guests, employees, cafe and rooftop patrons, Amtrak passengers, downtown visitors; and, the general public have different parking demand characteristics and peak periods. Hotel guest parking generally builds through the evening and declines significantly during the morning and daytime hours (pg 8).
- Would support a 'park once' pattern in which visitors can reach multiple destinations on foot without moving their vehicles between stops.
- The ATE analysis concludes that the combined 141 space supply in Lots #3 and #4 would be sufficient to accommodate the projected peak parking demand of all participating uses during typical summer conditions (Staff Report pg 21 and Attachment C pg 6).

The following 'findings' address the incompleteness and inconsistencies of the ATE study to come to that conclusion.

B.II. Finding: Inadequate Existing Lot #3 Peak Usage by Walker Study:
The usage survey was conducted in August 2025 on a Friday and Saturday of the third weekend of four weekends that August. **The utilization of Lot #3 was observed to be at 59% or 67 spaces out of 113.** That particular weekend is an outlier during busy summer weekends since the following week is when many school districts open up. Personally observed the four other weekends taking time stamped photos where the usage was closer to 85% capacity or 96 spaces. Those photos were sent in as part of my public comments when the new Walker Study was presented to the Public Facility Site Acquisition/ Development Committee; Planning Commission and City Council.

So it seems fair to assume that the existing usage of Lot #3 visitors is understated by 29 to 46 spaces in Table 4 below (85% to 100% occupancy) during the higher usage days.

B.III.Finding: Incomplete Estimated Linden Square and Palms Projected Parking Demand:
In ATE Table 4 Future Weekend Parking Demands, Linden Square has a demand of only 2 and the Palms of only 2 to 8? Linden Square had to pay a Development Impact Fee for 28 spaces ($625K). **Why wasn't that amount a suggested projection by Staff? A similar projection could have been made by Staff for the Palms.**

B.IV. a. Finding Table 4: ATE Conclusion Under Conjunctive Parking Methodologies That There is Sufficient Spaces in Lots #3 and #4 to Accommodate Existing and Projected Future Parking Demand is <u>Not Supported by Table 4 Future Weekend Parking Demands - Lots 3 and 4 in Attachment C ((pg7):</u>

B.IV.b Finding Table 4: Inconsistency with CMC Section 14.54.060 (conjunctive use of parking spaces. Table 4 shows that the hotel parking demand is the same time of day as existing downtown district and beach parking demand.

Table 4
Future Weekend Parking Demands – Lots 3 and 4

Parking Demand Component	Time								
	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM	7:00 PM
Existing Lot 3 (a)	44	51	51	57	56	56	52	***69***	69
Surfliner Inn	46	47	47	48	42	41	46	***54***	54
700 Linden (b)	2	2	2	2	2	2	1	***0***	0
Amtrak	6	6	6	6	9	9	7	***7***	6
Palms hotel (c)	2	4	4	3	3	4	5	***8***	8
Linden Avenue Parallel Spaces (e)	2	2	2	2	2	2	2	***2***	2
Total	102	112	112	118	114	114	113	***140***	139
Parking Supply	141	141	141	141	141	141	141	***141***	141
Extra Spaces	39	29	29	23	27	27	28	***1***	2

(a) Parking demand based on August 2025 parking occupancy surveys conducted by Walker Consultants.
(b) Parking demand estimates from Parking Study, ATE, April 15, 2021. Analysis accounts only for the office space that was vacant during the August 2025 surveys.
(c) Parking demand based on results from Traffic and Parking Study, ATE, June 6, 2024.
(d) Parking demand based on estimates from Parking Study, ATE, November 14, 2024.
(e) Assumes parking demand of 2 spaces for the two parallel spaces to be removed on Linden Avenue.

The above table for the Surfliner hotel parking demand includes hotel guests (22), cafe (15), rooftop bar for the general public (5) and rooftop event space for the general public (11).

Note: Above Table 4 has not been updated for the Planning Commission changes to the Amended Version of Condition No. 8 to Include Rooftop Special Events Dramatically Changes the Surfliner Parking Demand

With the inclusion of rooftop special events being limited to a maximum of 24 events per calendar year. Defined as an event that closes the rooftop to the general public; and, has a minimum attendance of at least 100 guests.

Also, there seems to be no limits for the Applicant to have rooftop events, closed to hotel guests and the general public, where the number of attendees are below 100. Like a Chamber mixer that could have 50 to 75 attendees.

Appeal B: Appeal Summary and City Council Action:

Recommend that the City Council conditionally approve this Appeal B and request Staff (Public Works and Community Developments Departments) to work with the Applicant and ATE to:

1. **Update the Conjunctive Parking Analysis and Justification (Attachment C) Tables 3 & 4 (pg 7) to include available additional evidence to accurately gauge whether proposed parking supply is sufficient introducing a hotel demand into the existing conjunctive shared parking for the downtown and beach usage:**
   - **Introduction of 12 EV spaces to the southern end of the public parking supply.**
   - **Correct the existing Lot #3 baseline usage for high occupancy days: increase usage percent from 69% to 85%.**
     Note: Walker Study presentation to City Council on 6/22/26 stated that demand will be higher at other times of the year than what was observed.
   - **Add in DIF off site parking estimates for Linden Square (paid for 28 in DIF) and the Palms (DIF assessment with construction starting?).**

The revised Tables 3 & 4 will then provide a more accurate projection of the total demand of all users to understand any potential immediate shortage for high usage days that would impact street parking demands.

Not recommending that any more public parking lot spaces be constructed at this time since there are many variables going into the modeling at this time. And, there is a specific condition of approval that follows below to manage the introduction of a hotel into the southern end of the downtown.

2. **Revise Attachment A. Exhibit 3. Project Conditions of Approval for the following:**
   # 4. Conditions for approval is a Conjunctive Parking Agreement (CUP Requirement):
   Establishing the terms and conditions governing the shared use of City Parking Lots #3 and #4 for public and hotel-related parking (pg 4).
   And, an Adaptive Parking Management Plan that will establish the implementing procedures and contingency measures necessary to respond if actual conditions differ materially from those anticipated.

3. **Addition of explicitly stating the following in #4 Condition of Approval:**

The City is the lead agency of the Public Parking Lots #3 & #4 as owners of both parking lots and will continue to operate the public parking facilities. The City will retain oversight of the conjunctive arrangement and any future operational modifications.

(from pg 24 of Attachment A. Exhibit 1. Findings for Approval and Staff Report pg 22).