



STAFF REPORT

DESIGN REVIEW BOARD

July 17, 2025

ITEM TITLE: JR DEVELOPMENT, LLC (APPLICANT); CONSTRUCTION OF A NEW MIXED-USE BUILDING, FEATURING A TRIPLEX, COMPLETE WITH A TWO-CAR GARAGE AND A ROOF DECK FOR EACH UNIT, AND A GROUND-FLOOR COMMERCIAL SPACE WITH AN ATTACHED RESIDENTIAL STORAGE AT 209 PALM AVE.

ORIGINATING DEPARTMENT:

COMMUNITY DEVELOPMENT

EXECUTIVE SUMMARY:

The owner of a property at 209 Palm Avenue (APN 625-201-02-00), which is located in the C/MU-2 (Seacoast Commercial & Mixed Use) Zone, has initiated the process to construct a new 310 square foot shell commercial building with an attached 705 square foot residential storage area above (intended to be converted into an Accessory Dwelling Unit) that is attached to a 5,798 square foot triplex, featuring a two-car garage, and a roof deck for each unit. The applicant is also requested an administrative adjustment to reduce the required ground-floor commercial ceiling height from 15' to 13'-6" (ref. Attachment 6).

RECOMMENDATION:

That the Design Review Board consider the design of the proposed new mixed-use building, featuring a triplex and ground-floor commercial space with an attached residential storage space above, provide staff with input regarding a request for an administrative adjustment to reduce the commercial floor-to-ceiling height from 15'-0" to 13'-6" (ref. Attachment 6), and recommend approval of the project's design to the City Council.

RATIONALE:

The project should contribute favorably to the mixed-use corridor and would comply with the purpose of the C/MU-2 Zone, which is to provide land to meet the demand for goods and services required primarily by the tourist population, as well as local residents who use the beach area. It is intended that the dominant type of commercial activity in the C/MU-2 Zone will be visitor-serving retail, such as specialty stores, surf shops, restaurants, and hotels and motels. Mixed-use and multiple-family residences are also permitted in the C/MU-2 Zone.

OPTIONS:

In addition to reviewing this report and adopting staff recommendations, the Design Review Board can:

- Recommend approval of the project with additional conditions provided by the Design Review Board; or
- Recommend that the project not be approved; or
- Recommend revisions based on comments from the Design Review Board.

BACKGROUND/ANALYSIS:

An application (USE-22-0097) was submitted to the City on July 15, 2022, for Regular Coastal Permit (CP-22-0014), Design Review Case (DRC-22-0027), Site Plan Review (SPR-22-0028), and Tentative Parcel Map (PM-22-0026) proposing to construct a new 310 square foot shell commercial building with an attached 705 square foot residential storage area above (to be converted into an Accessory Dwelling Unit) that is attached to a 5,798 square foot triplex, featuring a two-car garage and roof deck for each unit, at 209 Palm Avenue (APN 625-201-02-00) in the C/MU-2 (Seacoast Commercial & Mixed Use) Zone. The habitable space in each dwelling unit ranges from 1,616 square feet to 1,736 square feet, and ranges from three to four bedrooms per unit.

The project site is an existing 5,254 square foot lot fronting Palm Avenue. Vehicular ingress and egress to the property would be provided from Palm Avenue (North). Off-street parking areas are accessed from Palm Avenue in the form of a two-car garage for each dwelling unit, and one open parking space for



the shell commercial building. Pedestrian access to the dwelling units is provided from Palm Avenue via a concrete walkway on the North-West corner of the property. The properties to the North, East, and West are zoned C/MU-2 (Seacoast Commercial & Mixed Use), which is similar to the subject site, and the uses are commercial in character. The property to the South is zoned R-2000 (Medium Density Residential) and is a residential use.

Building Orientation and Design:

The proposed building orientation provides for one new two-story mixed-use building fronting Palm Avenue that is attached to a new three-story triplex. The project features a flat roof line for the rear dwelling units, and a butterfly roof for the building fronting Palm Avenue to provide a clean, modern design element that reinforces the structured, contemporary aesthetic while improving stormwater direction and reducing visual monotony. In addition, to provide variation in the building footprint and to lend relief of massing of the building, the residential portion of the project proposes three balconies on the West building elevation, a five-foot setback and stepback for the first and second floor on the Southern property line, and a 10-ft stepback for the third floor on the South property line.

Building Height:

The overall height of the building, including the roof decks and parapets, is approximately 33'-3". However, parapets may extend above the height limit (ref. IBMC Section 19.40.020). Not including the portions of the structure that may extend above the height limit, the building height from the average of the existing grade ranges from 24'-0 to 30'-0, which complies with the building height requirements in the C/MU-2 (Seacoast Commercial & Mixed Use) Zone.

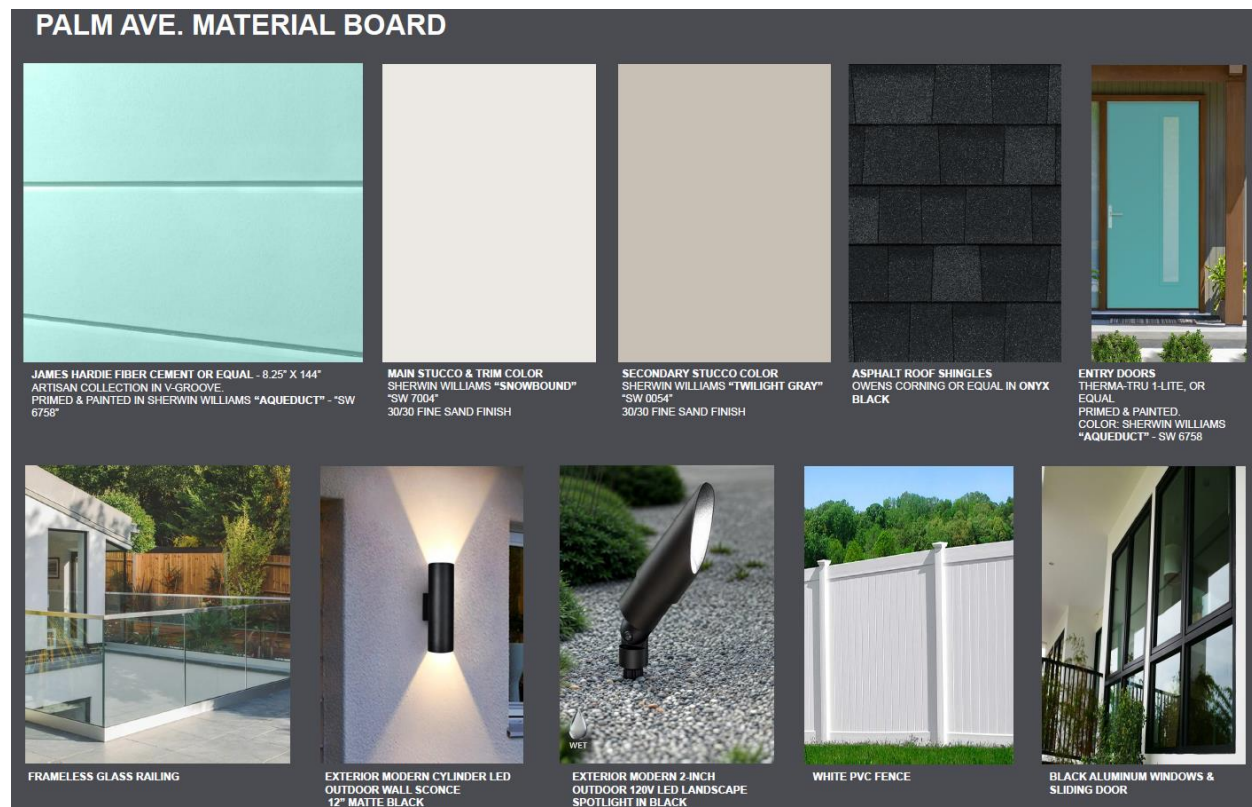


Per Imperial Beach Municipal Code (IBMC) Section 19.27.070 (B) "All commercial spaces on the ground floor shall have a minimum fifteen-foot floor-to-ceiling height". The project is proposing a floor-to-ceiling height of 13'-6". During the review, staff recommended that the applicant comply with the 15'-0" floor-to-ceiling height requirement. However, the applicant has requested an administrative adjustment citing that per Imperial Beach Municipal Code (IBMC) Section 19.84.150 states "The Community Development Department shall be authorized to grant an adjustment of up to ten percent of any development standard listed in this code, excluding density, parking and height requirements". Because the scope of work requires consideration from the

Design Review Board and the City Council, staff is seeking input from the Design Review Board and the City Council regarding the authorization of the administrative adjustment (ref. Attachment 6). The applicant believes that a reduced floor-to-ceiling height would accommodate a more functional and leasable commercial space for a typical local small business, such as a coffee shop or an artist studio. In addition, it would provide an adequate floor-to-ceiling height for the planned conversion of the residential storage area into an ADU that would advance Imperial Beach's local housing objectives.

Building Materials:

The building is proposed in a modern style featuring two colors of stucco, including "Sherwin-Williams Snowbound" and "Sherwin-Williams Twilight Grey". The building accents include colored building eaves in "Sherwin-Williams Snowbound" and "James Hardie Siding in Sherwin-Williams Aqueduct". The residential uses would utilize a horizontal siding design, while the commercial use would utilize a herringbone design.



Landscaping:

Per Imperial Beach Municipal Code (IBMC) Section 19.50.030, "Not less than fifteen percent of the total site shall be landscaped and permanently maintained". At a minimum, the project is required to provide 788.1 square feet of landscaping (5,254 SF lot size x 15%). Landscaping would be provided around the perimeter to enhance aesthetic appeal and drainage onsite, totaling 814.3 square feet (15.5%), which is compliant with the code. The proposed landscaping includes trees, ground cover, vertical green living wall, permeable driveway, low plants, medium plants, and tall plants. The proposed plant palette includes (1) Western Redbud, (3) Pygmy Date Palms, Angelina Stonecrop, Desert Gold Decomposed Granite, ½" – 1" Mixed Beach Pebble, (1) 8' x 10' vertical green living wall, permeable driveway, (14) Paddle Plant, (13) Echeveria Afterglow, (11) Lavandula, (9) Elk Blue California Gray Rush, (16) Snake Plant, (12) Star Jasmine Vine, and (6) Coral Aloe that would locate throughout the property for aesthetic appeal and drainage purposes.

DROUGHT TOLERANT LANDSCAPING

TREES



WESTERN REDBUD
CERCIS OCCIDENTALIS
MATURE HEIGHT: 10'-15'
MATURE SPREAD: 10'-15'



PIGMY DATE PALM
PHOENIX ROSEBENNETT
MATURE HEIGHT: 6'-10'
MATURE SPREAD: 6'-8'

GROUND COVER



ANGELINA STONECROP
SEDUM RUPESTRE ANGELINA



DECOMPOSED GRANITE
COLOR: DESERT GOLD



MIXED BEACH PEBBLE
SMALL 1/2" - 1"

SPECIAL FEATURES



VERTICAL GREEN LIVING WALL - 8' x 10'



PERMEABLE DRIVEWAY

TALL PLANTS



STAR JASMINE VINE
TRACHELOSPERMIUM JASMINOIDES
MATURE HEIGHT: 15'-20' (WITH SUPPORT CAN BE MAINTAINED SMALLER)
MATURE SPREAD: 5'-10'



CORAL ALOE
ALOE STRIATA
MATURE HEIGHT: 18" - 24" (FLOWER STALKS CAN REACH 2'-3' TALL)
MATURE SPREAD: 2'-3'

LOW PLANTS



PADDLE PLANT
KALANCHOE THYRSIFLORA
MATURE HEIGHT: 1.5' - 2'
MATURE SPREAD: 1'-2'



ECHEVERIA AFTERGLOW
ECHEVERIA ALOE PERFOLIATA VAR. DISTANS
MATURE HEIGHT: 1' - 2'
MATURE SPREAD: 1'-2'

MEDIUM PLANTS



LAVENDER
LAVANDULA ANGUSTIFOLIA
MATURE HEIGHT: 2' - 3'
MATURE SPREAD: 2'-3'



ELK BLUE CALIFORNIA GRAY RUSH
JUNCUS PATENS 'ELK BLUE'
MATURE HEIGHT: 1.5'-2.5'
MATURE SPREAD: 1'-2'



SNAKE PLANT
SANSEVIERIA TRIFASCIATA LAURENTII
MATURE HEIGHT: 4'
MATURE SPREAD: 2'-3'

WHY THIS PLANT PALETTE WORKS

✓ 1. DROUGHT-TOLERANT & LOW MAINTENANCE

ALL PLANTS THRIVE WITH LOW WATER USE, MINIMAL PRUNING, AND ARE IDEAL FOR DRIP IRRIGATION SYSTEMS.

✓ 2. LAYERED HEIGHT & VISUAL RHYTHM

CLEAR HEIGHT CONTRAST ADDS STRUCTURE IN A NARROW SPACE:

- **LOW:** ECHEVERIA 'AFTERGLOW' (BOLD ROSETTE)
- **MEDIUM:** LAVANDULA SPP. (COLOR + MOVEMENT)
- **MEDIUM-TALL:** JUNCUS PATENS 'ELK BLUE' (FINE VERTICAL TEXTURE)
- **TALL:** CORAL ALOE AND HONEYSUCKLE (SCULPTURAL, UPRIGHT FORM)

✓ 3. MODERN AESTHETIC & COLOR HARMONY

- SILVERY BLUES, SOFT PURPLES, AND WARM CORAL-REDS BALANCE SCULPTURAL AND FINE TEXTURES, ALIGNING WITH A CLEAN, MODERN DESIGN LANGUAGE.

✓ 4. POLLINATOR & HABITAT VALUE

LAVENDER, ALOE, AND NATIVE HONEYSUCKLE ATTRACT BEES, BUTTERFLIES, AND HUMMINGBIRDS; ELK BLUE ADDS HABITAT VALUE.

✓ 5. PEDESTRIAN SAFE

NO SPIKES, THORNS, OR AGGRESSIVE GROWTH. ALL SELECTIONS ARE SMOOTH-EDGED, SAFE FOR WALKWAYS, AND COMPACT IN FORM.

✓ 6. SHADE-TOLERANT & CLIMATE COMPATIBLE

ALL PLANTS HANDLE FULL SUN TO PARTIAL SHADE—PERFECT FOR CONDITIONS ALONG A SITE FENCE AND BESIDE A 3-STORY BUILDING.

Parking:

The minimum parking requirement for projects proposing “multiple-family residential” is 1.5 spaces per dwelling unit, and for projects proposing “commercial uses” in the C/MU-2 Zone is 1 space per 1,000 gross square feet of commercial (IBMC Section 19.48.035). Per Imperial Beach Municipal Code (IBMC) Section 19.48.070, “Where computation of required off-street parking results in a fractional requirement, the requirement shall be calculated as follows: If the fraction is one-half or more, it shall be calculated as one space”. In total, the project would be required to provide 6 spaces (4.5 spaces for the residential component and 1 space for the commercial space). The project is proposing (3) two-car garages, one two-car garage per dwelling unit, and 1 ADA open parking space for the commercial space. In total, the project is proposing 7 parking spaces, which is compliant with Imperial Beach Municipal Code (IBMC).

GENERAL PLAN CONSISTENTLY:

The purpose of the C/MU-2 zone is to provide land to meet the demand for goods and services required primarily by the tourist population, as well as local residents who use the beach area. It is intended that the dominant type of commercial activity in the C/MU-2 Zone will be visitor-serving retail such as specialty stores, surf shops, restaurants, and hotels and motels. Mixed-use and multiple family residences are also permitted in the C/MU-2 Zone. The development standards of the C/MU-2 Zone encourage pedestrian activity through the design and location of building frontages and parking provisions. (IBMC Section 19.27.010). The proposed mixed-use project meets the purpose and intent of the land use designation.

Zoning Chart:

| C/MU-2 Standards | Provided/Proposed |
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| Maximum density of one dwelling unit for every one thousand five hundred gross square feet of lot area (Section 19.27.020). | The property measures 5,254 square feet, which would allow for 3 residential units; 3 residential units are proposed. |
| <p>Specified commercial, residential, light industrial, public and semi-public, green building utilities, and open space and recreation uses allowed in the C/MU-2 zone are listed in Chapter 19.23, including those requiring a conditional use permit, and shall also comply with the following land use regulations:</p> <p>A. For all buildings with frontage along Seacoast Drive, including those with multiple-family dwelling units, "active commercial uses" as defined in Chapter 19.04 are required to be provided at a minimum sixty percent of each building's ground floor lineal footage and have direct pedestrian access from the Seacoast Drive sidewalk or a plaza. The remaining forty percent must either be primarily related to the commercial use, such as parking, access, or other non-active commercial purpose or, if related to non-commercial use, must be designed either to encourage and promote pedestrian activity or to visually screen required on-site parking.</p> | <p>A. The proposed project fronts Palm Avenue and not Seacoast Drive.</p> |
| <p>Yard requirements for the C/MU-2 zone are as follows:</p> <p>A. On property fronting on Seacoast Drive, the front of each building shall be set on the front property line. For purposes of this requirement an arcade is considered a part of the building. For lots not fronting on Seacoast Drive there are no front, side, or rear yard setbacks in the C/MU-2 zone except as follows:</p> | <p>A. The project fronts Palm Avenue. The vertical mixed-use building includes a shell commercial building on the ground floor located along Palm Avenue. The shell commercial building is setback 3'-0" from the north property line due to the recorded 3' landscape easement (1976-127422). The easement grants the grantee (City of Imperial Beach) the right to plant, install, and maintain trees, shrubs, lawns, ground cover or other landscape material.</p> |

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| <p>B. A ten-foot rear and/or side yard setback is required for properties abutting any property zoned R-1-6000.</p> <p>C. A five-foot rear and/or side yard setback is required for properties abutting any property zoned R-2000.</p> | <p>B. The property does not abut any property zoned R-1-6000.</p> <p>C. The rear yard (south property line) abuts a property that is zoned R-2000. The building is setback 5' on the first floor.</p> |
| <p>Stepbacks</p> <p>A. On property with a side or rear yard abutting a residential zone, the second-floor stepback shall be a minimum of five feet from the abutting residential property line and the third-floor stepback shall be a minimum of ten feet from the abutting residential property line.</p> <p>B. Stepbacks are not required where the ten-foot setback is required or observed for at least fifty percent of the property line abutting residential property.</p> <p>C. On properties fronting Seacoast Drive, an upper-story setback of five to ten feet is required for a minimum of fifty percent of street-facing façades along Seacoast Drive.</p> | <p>A. The property abuts a residential zone (R-2000) on the south property line. The building provides a five foot stepback for the second floor on the South property line, and a 10-ft stepback for the third floor on the South property line.</p> <p>B. The project is proposing stepbacks and is compliant with the Imperial Beach Municipal Code.</p> <p>C. The property fronts Palm Avenue and not Seacoast Drive.</p> |
| <p>Minimum Lot Size</p> <p>A. The minimum lot size for any new lot created in the C/MU-2 zone shall be three thousand square feet (for related provisions concerning small lots, see Chapter 19.42).</p> | <p>A. The project is not proposing the creation of a new lot. The lot currently measures 5,254 square feet.</p> |
| <p>Frontage</p> <p>A. Every new lot created in the C/MU-2 zone shall have a minimum width along a street of thirty feet (for related provisions concerning small lots, see Chapter 19.42).</p> | <p>A. The project is not proposing the creation of a new lot. The current width of the lot is 50.01'.</p> |
| <p>Building Height</p> <p>A. No building in the C/MU-2 (Seacoast Commercial) zone shall exceed three stories or thirty feet in height, whichever is less.</p> | <p>A. The overall height of the building, including the roof decks, and parapets is approximately 33'-3". However, parapets may extend above the height limit (ref. IBMC Section 19.40.020). Not including</p> |

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| <p>B. All commercial spaces on the ground floor shall have a minimum fifteen-foot floor-to-ceiling height; and single-story commercial buildings shall have a minimum building height of twenty feet.</p> | <p>the portions of the structure that may extend above the height limit, the building height from the average of the existing grade ranges from 24'-0 to 30'-0, which complies with the building height requirements in the C/MU-2 (Seacoast Commercial & Mixed Use) Zone.</p> <p>B. The project is proposing a floor to ceiling height of 13'-6". During the review, staff recommended that the applicant comply with the 15'-0" floor to ceiling height requirement. However, the applicant has requested an administrative adjustment citing that per Imperial Beach Municipal Code (IBMC) Section 19.84.150 states "The Community Development Department shall be authorized to grant an adjustment of up to ten percent of any development standard listed in this code, excluding density, parking and height requirements". Because the scope of work requires consideration from the Design Review Board and the City Council, staff is seeking input from the Design Review Board and the City Council regarding the authorization of the administrative adjustment (ref. Attachment 6).</p> |
| <p>Separation of buildings</p> <p>A. No buildings shall be located less than five feet from any other building on the same lot.</p> | <p>A. No buildings shall be located less than five feet from any other building on the same lot.</p> |
| <p>Parking</p> <p>A. Per Imperial Beach Municipal Code (IBMC) Section 19.48.035, the minimum parking requirement for projects proposing "multiple-family residential" would be 1.5 spaces per dwelling unit and for projects proposes "commercial uses" in the C/MU-2 Zone would be 1 space per 1,000 gross square feet of commercial.</p> | <p>A. In total, the project would be required to provide 6 spaces (5 spaces for the residential component and 1 space for the commercial space). The project is proposing (3) two-car garages, one two-car garage per dwelling unit, and 1 ADA open parking space for the commercial space. In total, the project is proposing 7 parking spaces, which is compliant with Imperial Beach Municipal Code (IBMC).</p> |
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| <p>Landscaping requirements are as follows (Section 19.50.030, Commercial Landscaping):</p> <ul style="list-style-type: none"> A. Not less than fifteen percent of the total site shall be landscaped and permanently maintained. B. There shall be a five-foot-wide landscape area between any parking area and any public street right-of-way. C. A portion of a property not used for buildings, parking, walkways, loading or storage areas shall be landscaped. D. There shall be a minimum three-foot by fifteen-foot, or forty-five square foot, landscaped area within the parking area (not including perimeter area landscaping) for every three parking spaces or the equivalent. A minimum width of three feet is required. A four-foot by fifteen-foot area may be permitted for every four spaces, five-foot-wide for five spaces, etc. E. Prior to issuance of any building permits, a complete landscaping plan shall be submitted to the Community Development Department for approval. Such approval shall be subject to appeal in the manner set forth in Sections 19.84.070 through 19.84.090. F. Landscaping and required watering system shall be installed prior to the use of the premises. All landscaping material in required landscaping | <ul style="list-style-type: none"> A. At a minimum, the project is required to provide 788.1 square feet of landscaping (5,254 SF lot size x 15%). Landscaping would be provided around the perimeter to enhance aesthetic appeal and drainage onsite, totaling 814.3 square feet (15.5%), which is compliant with the code. There is no parking area near the public right-of-way. B. There is no parking area near the public right-of-way. C. Portions of a property not used for buildings, parking, walkways, loading or storage are landscaped. D. The project provides adequate landscaping in the surface parking spaces. E. A complete landscape plan would be required prior to issuance of building permits. F. Landscaping and required watering system shall be installed prior to the use |
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| <p>areas shall be permanently maintained in a growing and healthy condition, including trimming, as appropriate to the landscaping material.</p> <p>G. A permanent irrigation system shall be installed to serve all landscaped areas.</p> | <p>of the premises subject to state requirements.</p> <p>G. A permanent irrigation system shall be installed to serve all landscaped areas subject to state requirements.</p> |
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SURROUNDING LAND USE AND ZONING:

| Surrounding Areas | Surrounding Zoning | Surrounding Land Use |
|--------------------------|--|-----------------------------|
| North | C/MU-2 (Seacoast Commercial & Mixed-Use) | Commercial |
| South | R-2000 (Medium Density Residential) | Residential |
| East | C/MU-2 (Seacoast Commercial & Mixed-Use) | Mixed-Use |
| West | C/MU-2 (Seacoast Commercial & Mixed-Use) | Commercial |

ENVIRONMENTAL IMPACT:

The project may be categorically exempt pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15332 (In-Fill Development Projects).

COASTAL JURISDICTION:

This project is located in the coastal zone as defined by the California Coastal Act of 1976. At a future meeting the City Council public hearing will serve as the required coastal permit hearing and the City Council will consider the findings under the California Coastal Act. The project is **not** located in the Appeal Jurisdiction of the California Coastal Commission as indicated on the Local Coastal Program Post Certification and Appeal Jurisdiction Map and, as such, would be appealable to the California Coastal Commission under Section 30603(a) of the California Public Resources Code.

FISCAL IMPACT:

The applicant has submitted a deposit of \$9,000.00 to process the application for a Regular Coastal Permit, Design Review Case, Site Plan Review, and Tentative Parcel Map.

ATTACHMENTS:

1. Attachment 1 - Project Plans
2. Attachment 2 - Project Renderings
3. Attachment 3 - Exterior Building Materials Board
4. Attachment 4 - Landscape Materials Board
5. Attachment 5 - DRB Checklist
6. Attachment 6 - Letter to City Request for Admin Adjustment