



CITY OF CORONADO
COMMUNITY DEVELOPMENT

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February 6, 2026

David J. Barboza, AICP
Housing Accountability Unit
651 Bannon Street, Suite 400
Sacramento, CA 95811

RE: Review of Coronado's Accessory Dwelling Unit (ADU) Ordinance under State ADU Law (Gov. Code, §§ 66310-66342

Dear Mr. Barboza:

The City is in receipt of your December 10, 2025 Findings letter with HCD's findings regarding the City's compliance with State ADU responding to the City's ADU Ordinance, codified in Coronado Municipal Code Section 86.56.105, which was most recently amended on April 16, 2024 and submitted to HCD within 60 days of its enactment on April 18, 2024.

The Findings letter initially requested a response from the City by January 9, 2026, but in subsequent correspondence with the City, HCD extended the response deadline to February 8, 2026 in consideration of winter holidays and City staff scheduled time out of the office. We appreciate the additional 30 days to respond that was granted, and we welcome further discussion on any of the points raised in your letter.

As an initial matter, the City notes that HCD reviewed and expressed no concerns with the City's ADU Ordinance in connection with the City's adoption of its Sixth Cycle Housing Element Update. However, the City acknowledges that the Legislature has subsequently amended the State ADU Law, and many of HCD's comments are in response to requirements enacted after the City's ADU Ordinance was last updated. The City will amend its ADU Ordinance to reflect the latest changes to, and requirements of, State ADU Law. Below, the City responds to each of the 31 items that were identified and outlines the steps it will take to modify its ADU Ordinance to ensure that the City's local ordinance maintains compliance with State ADU Law.

1. *Statutory Numbering* - The City will remove references to the old code section numbering and refer to the current Government code sections, as such sections may be amended by the Legislature from time to time.
2. *Section 86.56.105.B.1 – Primary Dwelling Types* - The City will revise the ordinance language to reference allowance of detached ADUs for existing or proposed multifamily dwellings.

3. *Section 86.56.105.B.2. – ADUs Attached to Accessory Structures* - While the City does allow for ADUs attached to accessory structures, and have permitted such proposals, the ordinance will be updated to make this clarification.
4. *Section 86.56.105.B.3 – Nonconforming Zoning Conditions* – The City interprets the provision of its ADU Ordinance to apply only to new construction. The City will update its ADU Ordinance to clarify that existing non-conforming conditions are not a basis to deny an ADU application.
5. *Section 86.56.105.B.3.a. – Requirement for Land Surveys* – State law allows for a new ADU to be constructed in the same location and built to the same dimensions as a legally approved existing structure. The City's requirement for a survey is to verify that any new ADU structure is in fact constructed in the same location and built to the same dimensions as the existing structure that is being rebuilt. The City was incorporated over 130 years ago (1890) and does not have documentation, let alone surveys or site plans with exact dimensions or setbacks for many properties. A survey is not a development standard and the City is unaware of alternative and reliable methods of verification. Therefore, the City finds that this requirement is necessary to verify compliance with the standards specified in the State ADU Law, and therefore consistent with the State ADU Law without further amendment.
6. *Section 86.56.105.B.3.c. – Waiver of Development Standards* – The City's ADU Ordinance does not state that a separate zoning review is required, nor are ADUs limited in size based on a percentage of the primary dwelling. The City's practice is to review the proposed ADU through a standard building permit application reviewed and approved by the Director, which does not include a separate zoning review. Nonetheless, the City is open to amending this section if HCD can specify its desired clarifying language. The City will delete the reference to a 16-foot height limit to reflect recent updates to the State ADU Law. Additionally, the City does not believe that the feasible alternative language is subjective as there are clear and objective standards that must be met (i.e. 4-foot setbacks, maximum 800 square feet, height limit); however, clarifying language can be added if specified by HCD
7. *Section 86.56.105.B.4. – Proposed Single Family Residence* - The City requires that when a new house and ADU are proposed on a vacant lot that the entire development comply with the floor area ratio (FAR) limits for the property and zone. This provision was reviewed and expressly upheld by the California Court of Appeal in its decision in *Scurlock v. City of Coronado* (Case No. D081136, 1/31/2024, not published). A copy of the Court of Appeal decision is attached for reference; note that the Court held that the City's ADU Ordinance "use[s] a process that resulted in a smaller primary residence but nonetheless allowed the desired ADU" which the Court found to be consistent with the purpose of State ADU Law and a reasonable "balance between increasing affordable housing and maintaining the character of existing neighborhoods." Because the Court of Appeal has already ruled that this provision of the City's ADU Ordinance is lawful and consistent with the State ADU Law, the City finds no further amendments are required to this provision.
8. *Section 86.56.105.B.5. – ADU and JADU Combinations* - The City will amend its ADU Ordinance to allow the maximum number of ADUs and a JADU pursuant to Government Code section 66323.
9. *Section 86.56.105.B.7. – Maximum Floor Area* – The City will amend its ADU Ordinance to remove maximum Floor Area Ratios for the three types of ADUs noted in Government Code Section 66323(a)(1), (3), and (4).
10. *Section 86.56.105.B.9. – Separate Sale of ADUs* – The City will amend its ADU Ordinance to allow for the sale of ADUs as outlined in the current version of Government Code Section 66341.

11. *Section 86.56.105.B.10. – Limits on Short-Term Rentals* – The City will amend its ordinance to reflect a property owner’s discretion to rent an ADU or JADU and reduce the minimum rental term from six months to 30 days.
12. *Section 86.56.105.B.11. – Missing Required Standards, JADUs* – The City will amend its ADU Ordinance to include the missing required standards for JADUs found in Government Code Section 66333 (a), (d), and (e).
13. *Section 86.56.105.B.11.a. – JADU Efficiency Kitchen* - The cooking appliances listed in this section are cited as an example; however, the City can remove that portion of the ordinance to satisfy this comment.
14. *Section 86.56.105.B.11.c. – JADU Owner Occupancy* – The City will amend its ADU Ordinance to remove the owner occupancy requirement for JADUs that have their own bathroom or when it is owned by a Governmental agency, land trust, or housing organization, in accordance with AB 1154 that became effective in January 2026.
15. *Section 86.56.105.B.11.d.iii. – JADU Short-Term Rental Prohibition* - The City will amend its ordinance to reduce the minimum rental term from six months to 30 days.
16. *Section 86.56.105.B.11.d.vi. – JADU Owner Occupancy, Deed Restriction* - The City will amend its ADU Ordinance to remove the owner occupancy requirement for JADUs that have their own bathroom or when it is owned by a Governmental agency, land trust, or housing organization, in accordance with AB 1154 that became effective in January 2026.
17. *Section 86.56.105.B.12.a. – ADU Parking Requirements* – The City will consider the barrier parking requirements placed on ADU development while maintaining compliance with the California Coastal Act as the entire City is located within the Coastal Zone.
18. *Section 86.56.105.B.12.d. – ADU Replacement Parking Requirements* - The City will consider the barrier replacement parking requirements placed on ADU development while maintaining compliance with the California Coastal Act as the entire City is located within the Coastal Zone.
19. *Section 86.56.105.B.12.e. – Carriage House Conversion* - The City will consider the barrier parking requirements placed on existing carriage houses converted to an ADU while maintaining compliance with the California Coastal Act as the entire City is located within the Coastal Zone.
20. *Section 86.56.105.B.13. – Subjective Design Standards* – The City agrees that subjective development standards cannot be placed on ADUs, and that standards have to be objective. As such, the City will amend its ADU ordinance to remove the requirement that “...the quality of materials shall be the same or exceed that of the primary dwelling.” The City would like clarification regarding the requirement that ADUs or JADUs “...shall utilize the same architectural style...” There are clear definitions of various architectural styles that can be applied to ensure architectural harmony, for example, modern, craftsman, and Spanish architecture. The City will craft objective language that accomplishes this goal while complying with state law and share it with HCD for their review prior to presenting an ordinance amendment to the City Council.
21. *Section 86.56.105.B.14. – Utility Connection Requirements* – Thank you for pointing out this typo. The City will correct the reference to call out subsection (B)(15) rather than (B)(16).
22. *Section 86.56.105.B.17 – Impact Fees* – The City will amend its ADU Ordinance to not impose impact fees on an ADU or JADU of 750 square feet or less.
23. *Section 86.56.105.C.1.d. – Misplaced Reference* - Thank you for pointing out this typo. The City will correct the reference to call out subsection (B)(11) rather than (B)(12).

24. *Section 86.56.105.C.2 – 66323 Units, Single Family Detached ADU* – The City will amend its ADU Ordinance to align with the updates State ADU Law allowing the height of an ADU up to 18 or 20 feet for ADUs located within ½ mile of a major transit stop or high quality transit corridor. The City will also correct the typo to call out Subsection B(11) rather than B(12).
25. *Section 86.56.105.C.4. – 66323 Units, ADUs Detached from a Multifamily Dwelling* – The City will amend its ADU Ordinance to allow the correct number of detached ADUs allowed for existing multi-family dwellings and acknowledge all three detached ADU height allowances described in Government Code Section 66323.
26. *Section 86.56.105.D. – Carriage House Conversions* – The City worked closely with HCD staff, including Paul McDougall, during the development of its Sixth Cycle Housing Element Update to allow conversions of carriage houses (no kitchen) to ADUs. In Coronado, a carriage house is a special exception to allow for a second story above a detached garage for properties that have alley access so long as they meet the criteria laid out in Coronado Municipal (CMC) Code Section 86.56.110. While some of these standards may be considered more restrictive than state law, there is nothing in state law that requires cities to allow for a two-story detached ADU. The City is committed to upholding its obligations under its certified Housing Element Update to encourage increased ADU development through carriage house conversions; however, we are concerned that this request exceeds existing state law and would impose new requirements that are inconsistent with prior HCD agreements reached during the Housing Element Update process. We would appreciate an opportunity to discuss this request further if appropriate.
27. *Section 86.56.105.E. – Review Procedure* – The City will amend its ADU Ordinance to replace the words and phrases “acted upon,” “acts on,” and “processed” with “approved or denied,” “approves or denies,” and “approved or denied,” and will remove the language “but thereafter shall be ministerially processed within 60 days of receipt of a complete application. The amended language will also require that ADU or JADU applications be approved or denied no later than the date the primary dwelling is approved or denied.
28. *Section 86.56.105.E. – Replacement Parking Requirements* - The City will consider the barrier parking requirements placed on ADU development while maintaining compliance with the California Coastal Act as the entire City is located within the Coastal Zone.
29. *Section 86.56.105.E. – Certificates of Occupancy* – The City will amend its ADU Ordinance to allow for the exceptions called for in Government Code Section 66328 by either adding the specific exceptions or a reference to 66328.
30. *Section 86.56.105.F. – Covenant Requirement* - The City will amend its ADU Ordinance to remove the deed restriction requirement for ADUs.
31. *Section 86.70.120 – Concurrent Processing* – CMC Section 86.70.052 provides exempt categories of development that do not require a Coastal Permit, including new single-family homes, and the City has consistently relied on this section to not require a Coastal Permit for any ADU established in the City. Should HCD still desire to see clear language that ADUs are not subject to a Coastal Permit the City can include such language in CMC Section 86.56.105.

The City plans to bring forward amendments to its ADU Ordinance to address many of the comments as outlined above. However, we would like to schedule a meeting with the appropriate HCD staff members to discuss some of the comments we have questions about, to go over anything HCD has questions about, and come up with a tentative schedule to bring the ADU Ordinance into compliance. Our goal is to come to a consensus prior to public hearings on the proposed amendments. Please contact Jesse Brown,

Principal Planner, at (619) 522-2415 or via email at jbrown@coronado.ca.us to schedule a time to discuss this in detail. Thank you.

Regards,

A handwritten signature in black ink, appearing to read 'Richard Grunow', with a long horizontal flourish extending to the right.

Richard Grunow

Community Development Director