
Coastal Access and Recreation Element





COASTAL ACCESS AND RECREATION ELEMENT

Introduction

This Element of the General Plan is an optional element not required by California's General Plan statutes. However, the subjects addressed in this element are central to an effective Local Coastal Land Use Plan. Protecting and enhancing public access to the coast is mandated by the California Coastal Act and was accepted as an essential part of Carmel's development long before the Coastal Act was adopted.

Carmel-by-the-Sea is a popular visitor destination, known as much for its spectacular coast as for its unique community character. Carmel Beach is owned and maintained by the City of Carmel and includes over 22 acres of white sand beach. Carmel Beach sits on the northern half of Carmel Bay, which stretches from Cypress Point on the north to the outer tip of Point Lobos to the south. The beach is used year round and represents an important recreational resource. (LUP)

One of the shoreline's outstanding features is the sand itself, with the texture and bright appearance of granulated sugar. Beaches composed of such fine white sand are very rare along the central coast of California. At about one mile in length, the beach's white sands extend out below translucent blue waters into Carmel Bay. Wind-sculpted Monterey Cypress trees line the bluffs. Views to the north are of the rocky headlands of Pebble Beach. The south vista is of Abalone Point and Point Lobos beyond. Together, the beach, ocean, trees and views combine to create one of the most scenic landscapes in California. (LUP)

Scenic Road and the Beach Bluff Pathway are also owned and maintained by the City of Carmel. The pathway offers a unique pedestrian experience as it meanders along the bluffs. The decomposed granite pathway passes between the tree-dotted, vegetated bluff outcrops and the rock curb that defines the edge of Scenic Road. The bluff top area is maintained by the City and is complemented by nine beach access stairways and a series of benches and overlooks. This pathway is heavily used, providing a complementary experience to the sandy beach. From the bluff top one can see different vistas, relax on benches, and stroll along a path that is perfect for jogging or pushing strollers or for those whose physical condition makes walking on the beach difficult or impossible. Over the years, Carmel has maintained a balance between preserving the beauty of the shoreline environment and adding the physical improvements that make the Carmel shoreline accessible and enjoyable to the public. (LUP)



Coastal Act Policies

One of the key objectives of the California Coastal Act is to maximize public access to and along the coast. This is evidenced in the Coastal Act's statement of goals, in the resource policies, and in the requirement for the preparation of a public access component within the local coastal program. (LUP)

Coastal Access and Recreation Background

Beach Access

Implementation of Coastal Act public access requirements focuses on two types of access: vertical and lateral. Vertical access provides routes from the "nearest public roadway to the shoreline." Lateral access is along the shoreline, typically immediately adjacent to a sandy beach or rocky inter-tidal zone, at the top of a bluff or otherwise above the high tide line, where pedestrians may walk along the coast without being affected by waves or any safety hazards presented by bluff edges. Parking facilities near the beach also is a local access issue. (LUP)

Carmel is among a limited number of California coastal communities where nearly the entire shoreline from the first public road to the sea is open to the public and easily accessible. The entire beach and bluff is dedicated as a City park and is kept as natural appearing as possible consistent with public access, habitat protection, safety and provision of limited recreational support facilities. (LUP)

The City has a highly evolved access system that integrates several types of facilities and regulatory programs to maintain the natural character of the beach and bluffs. The City provides vertical access at one to two block intervals along its entire coastline. (LUP)

- The west end of Ocean Avenue has long provided the principal vertical access point to Carmel Beach for visitors. This area has approximately 124 parking spaces freely available to the public and the main public restroom facilities are located here. (LUP)
- Access north of Ocean Avenue is provided via a dedicated easement through the Sand and Sea subdivision. Scenic Road and its Beach Bluff Pathway provide continuous lateral bluff-top access from Eighth Avenue to the south City boundary. Scenic Road also provides 127 parking spaces and twelve vertical



access points (stairways or sand ramps) from the bluff top to the beach below (see Figure 4.1). (LUP)

- Pedestrian easements provide convenient access to additional beach parking located along San Antonio Avenue. Pedestrian easements connect San Antonio Avenue to the Scenic Road corridor at the ends of 9th through 12th Avenues. Where possible, beach stairways are located near the outlet of these pedestrian easements to ensure a convenient, safe route to the beach. This minimizes foot traffic on the fragile bluffs, which would destroy landscaping and increase erosion. (LUP)
- Support facilities such as viewing benches, trash containers, sand wash-off stations, informational and safety signage, public restrooms, curbside parking and rustic guard railings complete the access system. (LUP)

Figure 4.1 shows a map of public access points to the beach. (LUP)

Access issues discussed at community workshops include means to provide improved access for the disabled, improved lateral access between Ocean Avenue and Eighth Avenue and restoration of the vertical access near Twelfth Avenue that was lost during the storms of 1982-83. This Plan assumes that the number and general distribution of existing vertical access facilities will be retained as long as bluff erosion and engineering feasibility allows. Improving vertical access to the beach for neighborhoods north of Ocean Avenue also is supported in this plan. (LUP)

Recreation and Support Facilities

Recreation is another fundamental component of the Coastal Act. The City's public beach is an important recreational resource both for the City's residents and visitors. The City limits structural improvements and prohibits commercial activity at the beach to protect its informal, natural character. While there are a variety of physical improvements such as public parking, the Beach Bluff Pathway, seawalls, stairways, restrooms and an irrigation well, the City always strives to keep these facilities low in scale, and designed to be simple and rustic in character using natural materials such as stone and wood. (LUP)

The winter storms of 1982/83 severely damaged the bluffs, roadway, and public access points along the shoreline. In some places the bluff retreated 30 to 40 feet inland destroying beach stairways, drainage facilities and vegetation. In response, the City embarked on a beach restoration project to restore and armor the bluff, rebuild damaged



Figure 4.1
Public Access



drainage and access facilities and make improvements to recreation facilities along Scenic Road and the beach. The project was funded in part with grant monies from the California Coastal Conservancy and included such amenities as the pathway, construction of new vertical access points along the beach, viewing platforms, public parking spaces, benches, signs, and shoreline armoring. In order to accommodate the new pedestrian path as well as maintain a 20' road width, the western edge of Scenic Road was realigned and approximately 22 parking spaces were eliminated. Prior to this project, there was no separate pedestrian path along the beach bluff--cars and people intermixed creating a public hazard. Even with the loss of parking, the project was found to be consistent with Coastal Act because it provided significant public benefits of improved lateral access along the bluff and vertical access to the beach. (LUP)

Today, the public continues to enjoy the benefits of the Beach Bluff Pathway and convenient access to the beach. It is estimated that more than 2.5 million people each year visit Carmel, and many of these come to see the beach. (LUP)

The Beach Bluff Pathway is a scenic trail that currently extends from Eighth Avenue south to the City limit. This Pathway runs parallel to Scenic Road and provides excellent views of Carmel Bay and the sandy beach. This pathway is a recreational amenity that is used by members of the public from the early morning hours until twilight. Since use of this pathway is a pedestrian activity members of this group are more likely to arrive on foot, making the pathway part of a longer walk through Carmel's neighborhoods. Some, however, do arrive by car and need a convenient place to park. For someone who desires to walk the full length of the pathway the most convenient place to park would be near one of the ends of the pathway. Within the program area there are over 100 parking spaces south of Thirteenth Avenue and 95 parking spaces located between Ocean and Eighth Avenues, making this requirement easy to satisfy. Very few use this pathway at night. There is some seasonality evident with peak use during the summer months. (LUP)

Parking demand exceeds supply especially on busy weekends days and during the summer season. During these times, competition for parking at the Ocean Avenue/Del Mar Avenue beach lot and the public parking spaces along Scenic Road reaches a peak and spills over into the on-street parking in adjacent residential neighborhoods. Demand for public parking and access to the beach typically wanes in the late afternoon. The City controls beach parking through design, dispersal and by regulating parking time limits. In public workshops the congestion at the Del Mar parking lot was identified as a problem that should be addressed. Policies in this land use plan support development of a master plan that includes a redesign of this area to improve circulation, reduce congestion, protect sensitive resources and enhance visual character. (LUP)



Among the most difficult facilities to site are public restrooms. The City provides a main restroom facility at the foot of Ocean Avenue/Del Mar parking area. This facility is often crowded and could be expanded to improve capacity on busy weekends. With more than a mile of coastline this single facility is often too distant to serve public needs and the City has long recognized the desirability of establishing a second or even a third smaller facility south of Eighth Avenue. Public demand is seasonal and this could allow for one or more nonpermanent restrooms to meet peaks in demand. Siting a permanent facility must account for the full cycle of storm activity, beach aesthetics, public and private views and service/maintenance needs. (LUP)

Other identified needs include an improved signage program, emergency response telephones and the development of educational materials for visitors and residents. Each of these will improve the enjoyment of recreational users of the beach and aid in the safe and effective management of this resource. (LUP)

Figure 4.2 shows a map of parks and open space, including Carmel Beach. (LUP)

Visitor Accommodations and Recreation Services

Visitor accommodations provide an opportunity for overnight visitors to stay in the City and is an important supporting aspect of coastal access and recreation for the City. Carmel-by-the-Sea is a popular visitor destination and accommodates a large supply of hotel and motel rooms. Based on a review of permits, there are 948 authorized motel/hotel rooms within City limits. Approximately 50 percent of the land area of the business district is occupied by motel uses, primarily in the RC (Residential/Commercial) and R-4 (Multifamily) districts. A large percentage of the land zoned for retail commercial activity also is occupied by visitor-oriented uses. With a resident population of less than 5,000, this represents a significant proportion of resources devoted to providing visitors with recreational opportunities and access to Carmel's coast. (LUP)

For these reasons, this Coastal Plan does not establish policies encouraging additional motel or visitor uses. Instead it recognizes the importance of these uses to the community and incorporates policies that will maintain and enhance the existing motel and visitor-serving uses. Policies that encourage local-serving uses and a balanced mix of uses seek to moderate the impacts of tourism on the residential community. These policies will benefit both the residential community and the visitor experience. Avoiding over-commercialization and preserving the uses necessary for local community life will enhance the charm and quality of life that makes Carmel so interesting to visit. (LUP)

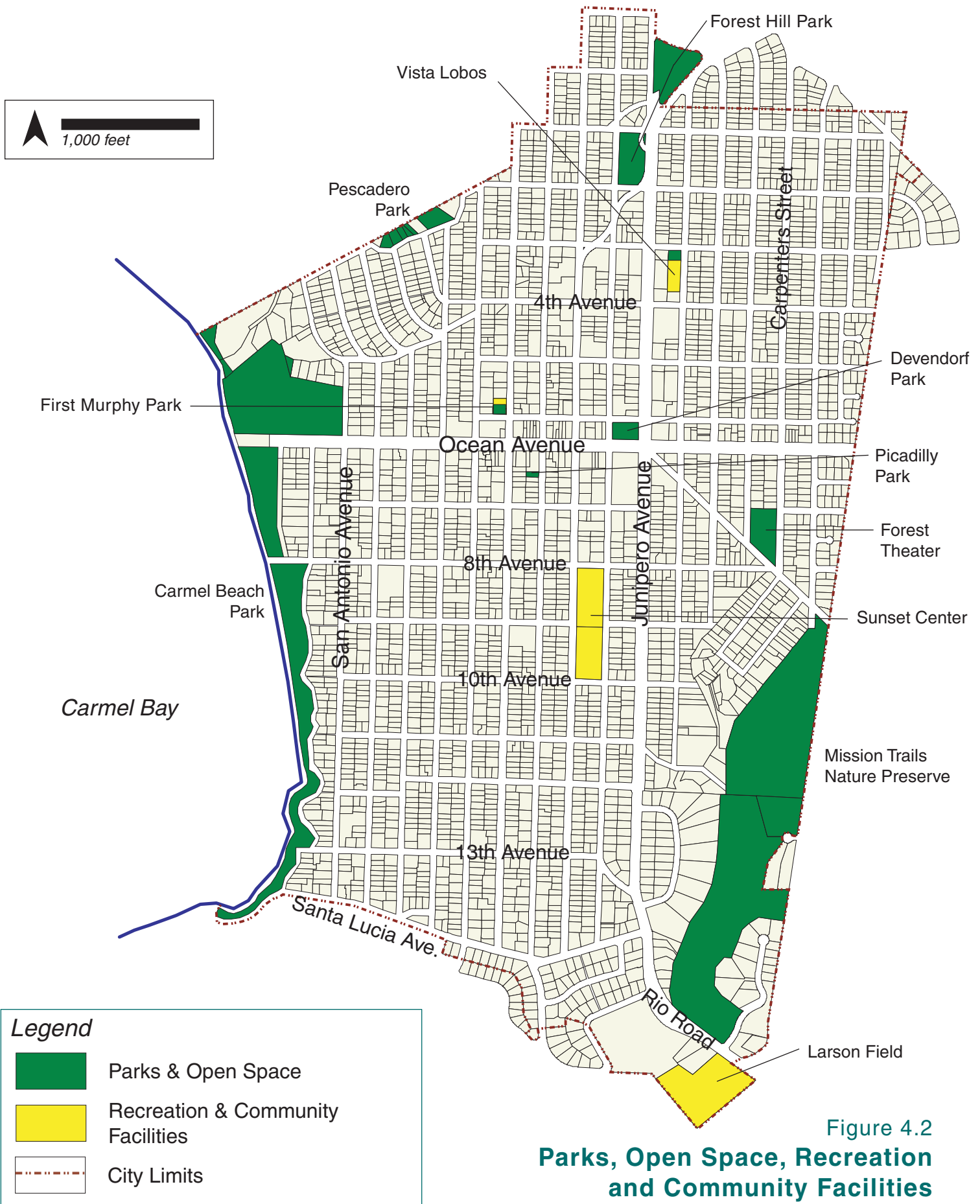


Figure 4.2
**Parks, Open Space, Recreation
and Community Facilities**



Many visitor accommodations are older and the City should expect renovations and replacement of these buildings over the next few decades. Coastal policies need to guide this natural recycling to accommodate visitor needs while retaining the scale and character of the downtown. One opportunity that would aid in mitigating the impacts of motels while preserving the existing motel stock is the transfer of R-1 Motels out of the single-family neighborhoods and into the commercial area. Land use and water policies address this opportunity. (LUP)

Additionally, there is some evidence that the City may be losing market share of overnight visitors to other regional facilities that provide conference facilities. Policy options to encourage expansion of small-scale conference facilities, and/or the development of a central conference facility that can be shared by all hotels/motels should be considered as a means of protecting the City's economic base. (LUP)



Goals, Objectives and Policies

Beach Access

G4-1 Provide for maximum public access to, and recreational use of, the shoreline consistent with private property rights and environmental protection. (LUP)

O4-1 Maintain frequent and safe points of access along the beach. (LUP)

P4-1 Development shall not interfere with the public's right of access to the sea. (LUP)

P4-2 Continue to provide vertical access along the Carmel shoreline at approximately one or two block intervals. (LUP)

P4-3 Improve and sign the vertical access at Fourth Avenue. Consider development of a pedestrian path from the foot of Jane Powers walkway to the Fourth Avenue beach access through Sand and Sea. Investigate and implement opportunities to establish or reestablish additional vertical access from North San Antonio to the beach to the extent feasible. (LUP)

P4-4 Periodically reestablish the sand dune at the foot of Ocean Avenue, to provide convenient beach access from the Ocean Avenue/Del Mar parking lot. Reestablish and regularly maintain a vehicle and disabled-access ramp south of Eighth Avenue. (LUP)

P4-5 Enhance pedestrian access to the shoreline from San Antonio Avenue using existing pedestrian access easements /drainage ways that connect San Antonio Avenue with Scenic Road located at Eighth, Ninth, Tenth, Eleventh, and Twelfth Avenues. Redirect surface storm water flows in these easements drainage ways to underground culverts to improve pedestrian safety, access, and aesthetics. (LUP)

P4-6 Keep the vegetation on San Antonio Avenue near pedestrian access easements pruned for safe visibility of pedestrians by motorists. (LUP)

P4-7 Protect the public's historic right of unrestricted access to the entire beach in Carmel-by-the-Sea from the southern to the northern city limit by prohibiting development that interferes with such rights and by actively defending established prescriptive rights. Complete the City's acquisition of the sandy beach along the entire Carmel shoreline. (LUP)



- P4-8** Abandonment or transfer of any public roadway or real property lying between the first public road and the sea shall not occur without reserving the right of public access over such real property unless an alternate route is made available to the public granting equal or greater public access to the Pacific Ocean in the same immediate vicinity. All impacts to public access shall be fully mitigated. (LUP)
- O4-2** Establish a local segment of the California Coastal Trail through Carmel-by-the-Sea by connecting existing pedestrian paths and developing new pedestrian paths or routes as required to create a continuous trail through the City. (LUP)
- P4-9** Designate the Beach Bluff Pathway as part of the California Coastal Trail (as long as this does not require any alteration to design or use). Coordinate with Monterey County to increase public awareness of the new segment of the Trail. (LUP)
- P4-10** Coordinate with Monterey County to establish a continuous coastal trail through Carmel that links Rio Park, Carmel Point, the Beach Bluff Pathway, and the trail network in Del Monte Forest. Support efforts by Monterey County to establish a pedestrian pathway around Carmel Point to continue the California Coastal Trail. (LUP)
- P4-11** Improve pedestrian circulation between the north end of the Beach Bluff Pathway at Eighth Avenue and the beach facilities at Ocean Avenue and the Del Mar Avenue parking lot as part of the Del Mar and North Dunes Master Plan. (LUP)
- P4-12** Provide safe and adequate pedestrian access from the Carmel Gate at the North City boundary to Ocean Avenue while protecting environmental resources. (LUP)
- P4-13** Sustain and maintain the Beach Bluff Pathway design concept and landscape plant selection. Authorize the Forest and Beach Commission to review and approve design changes and plant selections. Require a coastal development permit for significant changes or any change that would substantially alter the design concept. (LUP)
- P4-14** Install more seating along the beach pathway. (LUP)



G4-2 Develop a Master Plan for the Del Mar and North Dunes area. Upon approval, the Coastal Land Use Plan shall be amended to incorporate all elements of the Master Plan. (LUP)

O4-3 Appoint an ad hoc citizens committee to develop the Del Mar and North Dunes Master Plan. Address issues related to parking and circulation, access recreation facilities, aesthetics, special events, impacts on residents and visitors and protection of environmental resources. Guide Plan development using the goals, objectives, and policies of this Land Use Plan consistent with Coastal Act policies, for provision of public access and protection of sensitive resources. (LUP)

P4-15 Address circulation and parking problems. Make the area more pedestrian/people friendly and protect the environment. (LUP)

P4-16 Use City staff along with needed consultants (environmental restoration specialist, traffic engineer, landscape architect) to develop a plan of balanced improvement. (LUP)

P4-17 Consider reallocating parking so it will flow in a more efficient manner. Consider a regular shuttle from downtown or from a designated parking area. (LUP)

P4-18 Improve the pedestrian experience through the Del Mar parking area for those arriving on foot and from parked vehicles to the beach. Consider construction of boardwalks or other improvements to aid beach circulation, protect tree roots and protect the sensitive vegetation in the North Dunes area. (LUP)

P4-19 Provide disabled access consistent with ADA requirements. Provide access that blends with the beach and allows disabled individuals the opportunity to enjoy a more natural beach experience. (LUP)

P4-20 Provide adequate and aesthetically pleasing trash containers. (LUP)

P4-21 Provide secure bicycle racks. (LUP)

P4-22 Continue to support passive beach activities that are consistent with maintaining the natural beach setting. Active recreational opportunities need not be enhanced. (LUP)



- P4-23** Do not install formal picnic tables or benches. Rather, provide driftwood logs for seating. Picnicking on the beach should be conducted in a traditional manner with blankets, etc. (LUP)
- P4-24** Retain the informal atmosphere of the volleyball courts. (LUP)
- O4-4** Provide beach users with information about Carmel Beach, its vegetation, facilities, amenities, and limitations (rules). Educate the public about the danger of the beach and ocean environment and provide emergency response capabilities. (LUP)
- P4-25** Consider establishing and budgeting for the position of an educational officer who would patrol the beach and adjacent areas to educate people about beach usage and prevent damage to the environment. This person should have the authority to issue citations. (LUP)
- P4-26** Expand the existing beach brochure and distribute it through various visitor information outlets and distribution receptacles conveniently placed along the Scenic Road pathway. (LUP)
- P4-27** Consider conducting monthly beach tours hosted by staff or docents for the purposes of public education if there is sufficient demand for this service. (LUP)
- P4-28** Maintain emergency 911 telephones along the shoreline. (LUP)
- O4-5** Establish a uniform signage program for the beach and bluffs to better inform beach users of regulations governing activities on the beach. (LUP)
- P4-29** Post “beach access/pedestrians only” signs at the top of pedestrian easements to help visitors locate these access routes including North Dunes access routes and the easement from San Antonio through Sand and Sea. (LUP)
- P4-30** Install signage along Scenic Road to direct traffic and indicate beach parking hours. (LUP)
- P4-31** Use as few signs as possible to accomplish the desired purpose. Rely on design features and/or public education to influence behavior first. Establish standards for the total number of informational signs along the shoreline. (LUP)



- P4-32** Consider locating signs at the bottom of the bluff if appropriate. (LUP)
- P4-33** Use signs that are aesthetically pleasing, easily seen, minimal in size, brief in content, of muted color and uniform in design. (LUP)
- P4-34** Post educational/interpretive signs where appropriate along Scenic Road and in the North Dunes area. (LUP)
- P4-35** Post signs warning beach users about dangerous ocean conditions. (LUP)
- P4-36** Use international symbols whenever possible, along with a brief explanation of prohibitions and Municipal Code Section citations. (LUP)
- P4-37** Maintain all signs to ensure that they are legible. Signs that are vandalized or defective shall be replaced or repaired as soon as possible. (LUP)
- P4-38** Maintain signs at each stairway indicating fires must be at least twenty-five feet from the base of the bluffs and that they are not allowed north of Tenth Avenue. (LUP)
- P4-39** Use trash containers as a location for educational and regulatory signs. (LUP)

Recreation and Support Facilities

G4-3 Provide adequate facilities that will serve the needs of the public, mitigate damage to the environment, and respect the neighborhood. (LUP)

- O4-6** Limit development along the Carmel shoreline to facilities that support passive and active recreational activities, beach access, bluff protection and protection of infrastructure. Bluff protection and protection of infrastructure shall be permitted only when existing facilities are in danger from erosion. Ensure that any new structure or development is visually compatible with the natural beach environs, is consistent with the established design of existing facilities, minimizes coverage, and does not impede access. Avoid to the maximum extent feasible the seaward encroachment of new structures. (LUP)
- O4-7** Provide restroom facilities consistent with the volume of people who use the beach and Beach Bluff Pathway. (LUP)



- P4-40** Retain the existing restroom facility at the Ocean Avenue/Del Mar parking lot and consider improvements to increase its capacity. (LUP)
- P4-41** Retain the current second restroom facility at Santa Lucia Avenue until it can be replaced by a permanent site. Remove this facility upon construction of one or more additional permanent restrooms south of Eighth Avenue. (LUP)
- O4-8** Provide a parking program for Carmel Beach that supports convenient access without compromising aesthetics, environmental quality or residential character. (LUP)
- P4-42** Develop a design plan for the Del Mar parking area that improves circulation, reduces congestion, enhances visual quality, and enhances community character. The redesign shall avoid or minimize any loss of parking spaces. (LUP)
- P4-43** Continue to regulate beach parking using time limits. Retain beach parking as a free resource to the public facilitating access for all. Keep public spaces along the Beach Bluff Pathway small, intimate and dispersed to avoid large congregations of people that would disturb nearby residents. (LUP)
- P4-44** Provide convenient and free public beach parking from 5:00 a.m. until 12:00 midnight daily. Parking outside of these hours along Scenic Road and at the Del Mar parking lot shall be limited to residents and guests with a resident's parking permit. (LUP)
- G4-4** **Provide for a wide variety of passive and active recreational experiences for all beach users while protecting the resource values of beach environs. (LUP)**
- O4-9** Manage the City's beach, park and open space resources in a manner to encourage use and enjoyment by residents and visitors. (LUP)
- P4-45** Establish and maintain in public ownership the entire sandy beach on Carmel's shoreline from the north to the south City boundary. (LUP)



- P4-46** Establish, in coordination with the State Department of Parks and Recreation, Monterey County Regional Park District and the Monterey County Parks Department, a trail network linking the state-owned Odello land and Carmel River State Beach to the Carmel Mission, Mission Trail Nature Preserve and Beach Bluff Pathway. (LUP)
- P4-47** Allow surfing, hiking, picnicking, horseback riding, and typical beach games, such as Frisbee and volleyball on the beach without restriction. Allow dogs on the beach when on a leash or under voice control. Require dogs on the Beach Bluff Pathway to be on a leash. However, if the dog policy combined with educational efforts does not promote a safe environment for beach users and dogs, a leash law for certain times should be considered. (LUP)
- P4-48** Discourage any further incursion of recreational activities into the North Dunes habitat. Sensitive resources in the North Dunes habitat area shall be protected. (LUP)
- P4-49** Prohibit percussion instruments on Scenic Road, the Beach Bluff Pathway, and beach bluff without a permit. Prohibit sound amplifying equipment on the City Beach without a permit. (LUP)
- P4-50** Prohibit sales or other commercial activities on Carmel Beach, along the bluff or in the Ocean Avenue/Del Mar parking lot. (LUP)
- P4-51** Prohibit overnight camping on any portion of the beach and bluffs. (LUP)
- P4-52** Allow alcohol consumption on the beach until 10:00 p.m. (LUP)
- P4-53** Prohibit bicycles and skating on pedestrian access easements between Scenic Road and San Antonio Avenue and on the Beach Bluff Pathway. (LUP)
- P4-54** Prohibit private dune buggies and motorized marine vehicles on the beach. (LUP)
- P4-55** Maintain as operational all wash-off stations located adjacent to the stairways at Eighth, Eleventh, Thirteenth, and Santa Lucia Avenues. (LUP)



- P4-56** Implement procedures and regulations for temporary events on the beach that will protect public access and environmental resources. (LUP)
- O4-10** Allow beach users the opportunity to enjoy a fire for warmth or cooking, while protecting the sand from degradation. (LUP)
- P4-57** Allow beach fires until 10:00 p.m. south of Tenth Avenue but at least twenty-five feet from the base of bluffs. Install appropriate signage to indicate this distance and time limit and to indicate methods for correct extinguishing of fires with water. (LUP)

Visitor Accommodations and Recreation Services

- O4-11** Establish standards that support the improvement and/or replacement of existing motel facilities while mitigating impacts and enhancing the aesthetic character of these uses. Maintain the existing balance between visitor serving, general commercial, and residential land uses. (LUP)
- P4-58** Establish a City-wide cap on hotel/motel units equal to the number of existing authorized hotel/motel units. If units are demolished or converted to other uses allow lost units to be reestablished on other sites up to the cap. Periodically evaluate (at least every ten years) whether an appropriate balance of land uses is being maintained. (LUP)
- P4-59** Encourage the conversion of existing, under-performing commercial space to visitor accommodations within the limits of the cap. Mitigate impacts of motel uses on the long-term livability of any nearby residential uses. Protect and conserve all existing residential units in all commercial districts. (LUP)
- P4-60** Conserve and enhance the scale, character, landscaping and historic features of the City's motel sites and buildings when proposals for rebuilding or remodeling are considered. Promote the undergrounding of parking and the creation of attractive open space design features in such projects. (LUP)
- P4-61** Encourage the establishment of additional visitor support facilities (e.g. conference rooms, exercise rooms, etc.) at, or associated with, authorized motel uses in the commercial area to enhance the attractiveness of local accommodations. (LUP)



- P4-62** Lower cost visitor and recreational facilities shall be protected and encouraged and where feasible, provided. Developments providing public recreational opportunities are preferred. (LUP)
- P4-63** Retain measures to restrict commercial short-term rental of single-family residences in the R-1 district. (LUP)
- P4-64** Continue to prohibit the sale of interests in and rights to use real property in the City on a timesharing basis. (LUP)
- O4-12** Maintain a mix of commercial uses that are compatible with the character of Carmel as a residential village. (LUP)
- P4-65** Require visitor oriented retail businesses to be located in the core area of the commercial district. (See Figure 1.3) (LUP)
- P4-66** Allow resident-oriented businesses in all areas of the commercial district and particularly encourage such businesses in areas that also are in close proximity to community, cultural and public facilities within the commercial district. (LUP)
- P4-67** Require that all retail uses be conducted within a fixed place of business within the City. Prohibit exterior retail sales or soliciting from business to business ("in and about" retail sales). (LUP)