

## CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT  
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# W13a

**LCP-2-PAC-20-0027-1 (ADUs/REASONABLE ACCOMMODATIONS)**

**JUNE 9, 2021**

**CORRESPONDENCE**



510-319-9045 P  
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1901 Harrison St., 13<sup>th</sup> Floor  
Oakland, CA, 94612

Dear Coastal Commission,

California needs more safe, decent, and affordable housing. According to State Senator Scott Wiener, half of the housing shortage in the United States is in California. We are millions of housing units short. Accessory Dwelling Units are part of the solution. In 2019, the California State Legislature passed sweeping reforms to the ADU laws, but the Coastal Commission has yet to act. Soon the Coastal Commission will present an ordinance to update the law in the City of Pacifica.

The cost of housing is high, and we need housing for all people. Long commutes to job centers create more pollution, and it is hard on the people making those commutes.

Many of the people interested in ADUs are looking to house family members or earn rental income for retirement. In many cases, homeowners downsize, move into their ADUs, and rent out the primary structure to enjoy their golden years and not work so hard. This will allow our valuable, long-time homeowners to age in place, continue as Pacifica residents, and not be forced away from the community they love.

Let's stop talking about affordable housing and our progressive values and start acting in ways that produce more housing to increase the standard of living for all California residents. Please vote to approve the City of Pacifica's ADU ordinance immediately.

Sincerely,

Steven Edrington  
President, Adapt Dwellings

Hello Commissioners,

I am writing because I am trying put an ADU in my garage and the California Coastal Commission's inaction and inability to finalize the ordinance in Pacifica has blocked and continues to block my ability to progress on this project.

The California legislature has voted and approved the building of these units. My project does not impact any of the Coastal Commission's concerns; my project does not add additional square footage as it will be in my garage, it does not impede coastal parking as I have a four car driveway and it does not in any way impact access to the coast as I am more than two blocks from the beach and beach parking.

Since March 12, 2020 my work as a professional flutist has evaporated. Despite the fact I have a Masters degree and a solid work history I have been unable to find any sort of new work, perhaps because I am 65.

The ADU legislation was written to help people like me, I am the poster child for this ADU legislation. Not only will this unit provide much needed income at a point when there is almost no work in my field but will be the place I live when I can no longer handle the stairs.

Government is supposed to work for the people so with that in mind I urge you to move forward with an agreement on this ordinance to do as the California State Legislature has implemented and is a vital lifeline for many low income Californians like myself.

*Gail Edwards ~ Flutist/Teacher*

Sacramento Philharmonic & Opera, Modesto Symphony

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## KoppmanNorton, Julia@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Tuesday, June 1, 2021 9:41 AM  
**To:** KoppmanNorton, Julia@Coastal  
**Subject:** FW: Public Comment on June 2021 Agenda Item Wednesday 13a - City of Pacifica LCP Amendment No. LCP-2-PAC-20-0027-1 (Accessory Dwelling Units)

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**From:** Christopher Pederson <cpedersonlaw@gmail.com>  
**Sent:** Friday, May 28, 2021 10:25 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; Brownsey, Donne@Coastal <donne.brownsey@coastal.ca.gov>; Groom, Carole@Coastal <carole.groom@coastal.ca.gov>; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>  
**Subject:** Public Comment on June 2021 Agenda Item Wednesday 13a - City of Pacifica LCP Amendment No. LCP-2-PAC-20-0027-1 (Accessory Dwelling Units)

Dear Chair Padilla and Commissioners:

I urge you to reject the proposed suggested modifications to the City of Pacifica LCP amendment that would mandate off-street parking for accessory dwelling units (ADUs) in a “coastal access parking area” even when they are within one-half mile of public transit. Those proposed modifications conflict with the Coastal Act, the City of Pacifica LUP, and state law regarding ADUs.

The Coastal Act provides that new development shall maintain and enhance access to the coast by facilitating transit service and by providing adequate parking or otherwise “serving the development with public transportation.” (Pub. Resources Code, section 30252.) The City of Pacifica LUP Policy 25 reiterates this requirement. The Coastal Act and the Pacifica LCP also both require new development to minimize vehicle miles traveled. (Pub. Resources Code, section 30253(d); LUP Policy 26.)

The Legislature revised the ADU statute in 2016 to specify that “[n]otwithstanding any other law” a local government “shall not” impose parking requirements on ADUs located within one-half mile of public transit. (Gov. Code, section 65852.2(d).) (The statute was subsequently amended to specify within one-half mile walking distance of public transit.) Significantly, the Legislature added this provision to the ADU statute more recently than the provision quoted in the staff report regarding the interaction of the Coastal Act and the ADU statute.

Both the Coastal Act and the Pacifica LUP specify that providing public transit service is a substitute for any requirement to provide parking. (Pub. Resources Code, section 30252; Pacifica LUP Policy 25.) Because the Legislature has determined that providing public transit within one-half mile of an ADU is sufficient for waiving parking requirements, the City of Pacifica’s proposal to waive parking requirements for all ADUs meeting that requirement is also fully consistent with the Coastal Act and the Pacifica LUP.

Because ADUs are inherently a lower-cost form of housing than stand-alone single-family residences, imposing requirements that deter ADUs would also conflict with Coastal Act and Pacifica LUP requirements regarding housing for low- and moderate-income households. The Coastal Act requires the Commission to encourage housing opportunities

for persons with low or moderate income and declares that it is important for the Commission to encourage the provision of new affordable housing for low- and moderate-income households. (Pub. Resources Code, section 30604(f)-(g).) The Pacifica LUP further mandates that lower cost housing opportunities for persons of low and moderate income shall be encouraged and, where feasible, provided. (LUP Policy 5.)

When the Legislature amended the ADU statute to eliminate parking requirements for ADUs located close to transit, it declared that the ADU statute was intended to facilitate the construction of affordable housing. (Stats. 2016, ch. 720 (SB 1069) amending Gov. Code, section 65582.1(g).) The legislative history for the bill explained that off-street parking requirements have acted as a barrier to the construction of ADUs, which can be a low-cost form of affordable housing. (Senate Floor Analysis, SB 1069 (Aug. 30, 2016.)

The proposed suggested modifications to require off-street parking for ADUs close to the shoreline even when those ADUs are within one-half mile of transit therefore conflict with the Coastal Act's and the Pacifica LUP's policies regarding public transit, parking, and affordable housing. Please revise the suggested modifications to specify that minimum parking requirements do not apply to any ADUs located within one-half mile walking distance of public transit.

Thank you for your consideration of my comments.

Sincerely,

Christopher Pederson