

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



F7a

A-2-PAC-22-0029 (Pacifica Safe Parking Program – Bradford Way)

August 12, 2022

CORRESPONDENCE

Ringuette, Oceane@Coastal

From: Murdock, Christian <cmurdock@pacifica.gov>
Sent: Wednesday, July 27, 2022 3:49 PM
To: Rexing, Stephanie@Coastal
Cc: KoppmanNorton, Julia@Coastal; Ringuette, Oceane@Coastal; O'Connor, Bonny
Subject: RE: Temporary Safe Parking Program CDP Appeals

Hi Stephanie,

One unanswered question on our last call was whether the OSV ordinance is currently being enforced in the Coastal Zone. I can confirm that the OSV ordinance is being enforced within the Coastal Zone. Therefore, whatever action the Coastal Commission may take on the Safe Parking Program CDPs would not determine whether the OSV ordinance takes effect in the Coastal Zone. That means the main impact of a substantial issue determination on the appeals is that opportunities for lawful habitation as part of the City's Temporary Safe Parking Program would be delayed for at least five individuals/families until the appeals are resolved.

With that in mind, I hope your staff recommendation will focus on the merits of the Safe Parking Program CDPs themselves given they bear no direct relationship to the OSV ordinance. My opinion is that the appeals raise no substantial issue given the LCLUP consistency as analyzed in the City's approvals and the positive attributes of the Safe Parking Program required through conditions imposed on the CDPs, including coastal resource protections to prevent illicit dumping of sewage and trash control. The OSV ordinance is a separate issue entirely and the City has no immediate plans to consider a CDP. However, to the extent you need to explain the City's OSV ordinance to the Coastal Commissioners, please note the following:

- The OSV ordinance's parking standards are codified in [PMC sec. 4-7.1205](#). The parking standards are safety-based and driven primarily by street width. Given the City's age, there are many narrow streets which results in various safety challenges for multi-modes of transportation based on those street widths. For instance, OSV obstruction of traffic safety sight lines within 100 feet of an uncontrolled intersection, and obstruction of bike lanes/bus routes forcing those street users to veer outside their normal paths of travel.
- The OSV ordinance has no time of day restrictions other than those generally applicable to parking of all vehicles, such as a 72-hour parking limit.
- The City has prepared a [map of allowable OSV parking locations](#). You will see that there are ample parking locations in northern, central, and southern Pacifica. Even with the 100-foot intersection standard, the long blocks in the mapped areas facilitate OSV parking and would not result in an effective prohibition as may be the case in other jurisdictions.

Let me know if you have any questions or would like to discuss further. Thank you.

Regards,

Christian



CHRISTIAN MURDOCK, AICP
DEPUTY DIRECTOR OF PLANNING
CITY OF PACIFICA | PLANNING DEPARTMENT
540 Crespi Drive, Pacifica, CA 94044
Phone: (650) 738-7341 | cmurdock@pacifica.gov

Ringuette, Oceane@Coastal

From: Murdock, Christian <murdockc@ci.pacifica.ca.us>
Sent: Tuesday, December 10, 2019 4:39 PM
To: KoppmanNorton, Julia@Coastal
Cc: Bautista, Sam; Steidle, Daniel; Wehrmeister, Tina@City of Pacifica; REXING, Stephanie@Coastal
Subject: RE: Oversized Vehicle Ordinance

Follow Up Flag: Follow Up
Flag Status: Flagged

Thanks so much, Julia. Will also review this information.

Regards,

Christian



CHRISTIAN MURDOCK | SENIOR PLANNER
CITY OF PACIFICA | PLANNING DEPARTMENT
1800 Francisco Boulevard, Pacifica, CA 94044
Phone: (650) 738 – 7444 | murdockc@ci.pacifica.ca.us

HOLIDAY HOURS: City offices will be closed Monday, December 23 through Wednesday, January 1. Offices will reopen Thursday, January 2. Building Inspection Services only will be available December 23, 26, 27, 30, and 31 by calling the Inspection Hotline at (650) 737-1000. Building permitting and other Planning counter services will not be available during the holiday closure.

From: KoppmanNorton, Julia@Coastal [mailto:julia.koppmannorton@coastal.ca.gov]
Sent: Tuesday, December 10, 2019 4:38 PM
To: Murdock, Christian
Cc: Bautista, Sam; Steidle, Daniel; Wehrmeister, Tina; REXING, Stephanie@Coastal
Subject: RE: Oversized Vehicle Ordinance

[CAUTION: External Email]

Hi Christian,

Yes, confirming that the CDP would only be appealable to us for streets within the appeal jurisdiction.

The most recent examples we have all went the CDP route, so we don't have examples of related LCP amendments that come to mind. If Pacifica were to go the LCPA route, we would work with you on that, but you might be a pioneer of that approach. However, [here is an example](#) of a parking requirement that was incorporated into an IP, although it isn't specifically about a restriction/ban.

Thanks!

Best,
Julia

From: Murdock, Christian [mailto:murdockc@ci.pacifica.ca.us]
Sent: Tuesday, December 10, 2019 3:18 PM
To: KoppmanNorton, Julia@Coastal
Cc: Bautista, Sam; Steidle, Daniel; Wehrmeister, Tina@City of Pacifica
Subject: RE: Oversized Vehicle Ordinance

Hi Julia,

I appreciate the information. We will carefully evaluate it to determine the best approach for Pacifica. Regarding the second approach (CDP issuance), I would imagine the CDP would not be appealable to the Coastal Commission unless it affected streets within the appeal jurisdiction. Please confirm.

Regarding the first approach, do any specific jurisdictions' LCP amendments come to mind which you are familiar with, and that may include some more analysis of how this sort of parking ordinance constitutes a "change in the density or intensity of use of land" (Public Resources Code [sec. 30106](#), definition of "development")? I noticed a letter from Dan Carl to Santa Cruz Mayor Cynthia Mathews (4/27/2016) that mentions the Coastal Commission having provided Santa Cruz with a legal analysis of the issue ([W16e-8-2016](#), PDF p. 81). I also noticed later in the same W16e-8-2016 meeting attachment on PDF p. 89 that the Coastal Commission Executive Director Peter Douglas in 1993 cited ordinances regulating parking on streets within the Coastal Zone as implicating the "change in the intensity of use of water, or of access thereto" element of the definition of "development" in PRC sec. 30106.

Understanding the appropriate rationale more fully is important to us since, at its most extreme, it could ensnare routine traffic engineering matters of the City such as painting curbs (red, green, blue), modifying lane widths, and other activities needed for safe management of public streets. That is the purpose of this ordinance – to ensure safe use of the public streets by all modes of travel by preventing adverse impacts from oversized vehicles parked on streets which are not designed to accommodate them. The staff report for the proposed ordinance outlines the technical rationale for oversized vehicle parking restrictions based on street design characteristics. Oversized vehicle parking would remain available on streets with adequate design to accommodate them, including any such streets within the Coastal Zone.

Regards,

Christian



CHRISTIAN MURDOCK | SENIOR PLANNER
CITY OF PACIFICA | PLANNING DEPARTMENT
1800 Francisco Boulevard, Pacifica, CA 94044
Phone: (650) 738 – 7444 | murdockc@ci.pacifica.ca.us

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From: KoppmanNorton, Julia@Coastal [<mailto:julia.koppmannorton@coastal.ca.gov>]
Sent: Tuesday, December 10, 2019 12:18 PM
To: Murdock, Christian; Bautista, Sam
Subject: Oversized Vehicle Ordinance

[CAUTION: External Email]

Hi Christian & Sam,

Thank you again for the call yesterday. If you could ensure this gets to Dan with the Police Department as well, that'd be great. As I said on the call, until we resolve how to enact the oversized vehicle ordinance in the Coastal Zone, the ordinance cannot go into effect in those areas. The basis for this is that this ordinance would change parking restrictions on roads in the Coastal Zone that would meet the definition of development (change in intensity or density of use). This can be resolved in one of two ways: either 1) through an LCP amendment, if there is an appropriate location to amend the text within the document as such, or 2) through a CDP the City would issue to the applicant (which would be appealable to the CCC) to implement the program and apply the restrictions on the roads.

As other jurisdictions have come forward and proposed these types of programs the Commission has been especially concerned with assuring these programs are Coastal Act-consistent regarding public access and environmental justice concerns. As a result of this, we would need to see that the program is narrowly tailored to address a specifically documented problem (through official data such as citations, police reports, or data collected in the community, etc.) and to then explain how the proposed parking restriction has been developed in a manner that has the least impact on public access (to streets and other public areas) and in a way that won't disproportionately affect a certain segment of the population, taking into account environmental justice implications. If there are actual or perceived impacts, we would ask for an explanation as to how Pacifica plans to address these impacts in a holistic manner. We have also asked other jurisdictions conducting parking restrictions to include a monitoring component to measure the parking program's effectiveness over time.

Please let me know if you have any questions, and let me know what the plan and timeline is for moving forward on this. Thanks!

Best,
Julia

Julia Koppman Norton
Coastal Planner
North Central Coast District
California Coastal Commission
(415) 904-5292



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Ringuette, Oceane@Coastal

From: Lawrence E Bothen <lbothen@sbcglobal.net>
Sent: Tuesday, July 26, 2022 1:29 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)

California Coastal Commission

July 26, 2022

I am writing to appeal the decision permitting City of Pacifica Public Works Dept. to designate two "Safe Parking Program" parking spaces on Bradford Way next to Sharp Park Golf Course on the Highway 1 frontage for Oversize Vehicles. Apart from the visual blight these usually dilapidated RV's bring, they already have a rich history of disruption and pollution wherever they park.

First, the parking spaces block a bike lane that is signed as a designated bicycle route. Allowing OSV parking in this lane forces cyclists out into traffic lanes. Second, their presence is often accompanied by the drone of a generator to provide electricity to the RV, creating noise pollution and air pollution that is equally harmful to wildlife and humans. Third, and most damaging, is their dumping of trash and toxic wastewater into the gutter, which drains into storm drains and ultimately into either the ocean or the freshwater lagoon in the golf course. As has been noted in many arguments about the golf course, it is a habitat for the endangered red frog and San Francisco garter snake.

Introducing these elements into a sensitive environment will cause harm to it and the native species that inhabit it. I know there will be arguments that the permit process will weed out bad actors and formalize enforcement of its rules. That presumes that Pacifica has the commitment or wherewithal to enforce them. The fact is the city never enforced existing laws on the books long before the introduction of the OSV parking ordinance, claiming such actions must be witnessed to enforce them. Apparently citizen witnesses don't count, but the number of those incidents, along with homeless encampments along our creeks, undoubtedly contributes to Linda Mar State Beach being one of the most polluted beaches in California. Last year three different city agencies failed to abate one person operating an illegal surfboard business out of his van while squatting at various locations near the beaches, although he was known to be dumping toxic chemicals into the ground. Multiply that times the number of RV's already here without permits and you begin to see the scope of the problem.

Coastal Commission approval of overnight RV parking in proximity to our shores anywhere in Pacifica will ultimately result in increased pollution and threaten the public health and safety of our beaches. For these reasons I urge you to rescind your approval of overnight parking.

Respectfully,
Lawrence Bothen
Pacifica

Sent from [Mail](#) for Windows

From: [Norma Hilton](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)
Date: Wednesday, July 27, 2022 10:33:21 PM

Dear Members of the Coastal Commission:

I want to voice my deep concern for City of Pacifica's Safe Parking Program. I wholeheartedly support Mr. Guillet's appeal. Allowing oversized vehicles to park on Bradford Way will cause great harm to the coastal environment. I have witnessed RVs with leaking pipes allowing all sorts of hazardous waste to drip (and occasionally dump) directly into the gutter and flow straight to the ocean, causing great harm to this very fragile environment. These vehicles also obstruct the safe passage of cyclists and pedestrians along the roadway which leads to the Coastal Trail. It is likely that a majority of the RV dwellers have no ties to Pacifica. They do not share our love of the ocean and the many endangered species who share this world with us.

Please, please do not allow parking of recreational vehicles along Bradford Way.

Thank you for your consideration of my comments.

Norma Hilton

Ringuette, Oceane@Coastal

From: Stephanie Meyer <stephdomo@gmail.com>
Sent: Friday, July 22, 2022 9:33 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)

I am against allowing large vehicle parking in this location. It is not fair to the residents of the area to have to look at random vehicles parking in these open spaces near the golf course. It is an eyesore. If someone is without a place to live, I don't believe they should set up a temporary residence without paying one penny to the City in fees or property taxes. If I became homeless, I would move somewhere where my dollar could stretch further (farther?) and not burden residents with my plight. Thank you for your attention in this matter.

Sent from [Mail](#) for Windows

Ringuette, Oceane@Coastal

From: DENNIS MIRALDA <dennisdives@hotmail.com>
Sent: Sunday, July 24, 2022 10:11 AM
To: NorthCentralCoast@Coastal
Cc: Jeff Guillet
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)

I was following a Sam Trans bus down Francisco Blvd. next to the golf course.....Is the coastal commission aware that with an RV parked there the bus needs to swing out into the on coming lane in order to pass ----I've also seen cars ,trucks and bikes swinging out into on coming traffic a real hazard with liability concerns.

Dennis Miralda
West Fairway Park

From: [Suzanne Moore](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)
Date: Thursday, July 28, 2022 10:57:24 AM

Honorable Commissioners:

I am a long-time Pacifican homeowner, and I am an advocate for low-income housing and solutions for homelessness. I am a sitting board member for Healthcare for the Homeless and Farmworkers Program, a retired Family Nurse Practitioner, and a former Primary Care Provider at both the Daly City and South San Francisco Clinics. In these capacities, and with recent information provided by our County's "Working Together to End Homelessness", I have increased my knowledge and conviction that housing is needed for life and health and that homelessness can be reduced.

I live just 4 blocks from 5 spaces identified (and in current use) by participants in Pacifica's Safe Parking Program. I feel comfortable that participants are my neighbors, and I am grateful that Pacifica is part of programs to provide wrap around services to our unhoused and provide a pathway for permanent housing.

I served on Pacifica's Unhoused in Pacifica Task Force. At a Task Force community forum in November 2019, over 70% of participants favored a Safe Parking Program prior to initiation of an Oversize Vehicle Ordinance. I suspect the Coastal Commission is aware that a pilot Safe Parking Program was suggested to our City Council but was not moved forward. This current program is the result of a settlement in federal court found in favor of courageous unhoused plaintiffs who pursued their civil rights. The plaintiffs requested the program be overseen by the Pacifica Resource Center as a trusted local organization with knowledge of the needs of the Unhoused. The Resource Center has made every effort to mitigate environmental impact of the program and remains open to community input.

I understand the fear that community members have about the program, but their fears are unjustified. I respectfully request that this Commission approve the designated spaces for Pacifica's Safe Parking Program. It is important to face our fears to solve the great issues of our time. Housing and environmental protection are not mutually exclusive. Pacifica needs to boldly pursue both to address the needs of future generations. Thank you.

Ringuette, Oceane@Coastal

From: Paige Saunders <paigela@me.com>
Sent: Monday, July 25, 2022 7:31 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)

Dear members of the North Central Coast Commission,

I wish to add my voice in the appeal of the decision for the use of the Francisco Blvd / Bradford Way / Sharp Park corridor permitting two oversized vehicles for consistent overnight parking. This street is part of a bicycle route and walkway for residents of Fairway Park and also for bicyclists and hikers who make their way along the coast to enjoy the Golden Gate National Recreation Area at Mori Point and beyond.

Having two large RVs consistently parked at this location is dangerous—they severely limit the view of oncoming traffic and make bike riders (and cars) swerve in the street to avoid them. Those who want to walk by these vehicles could be inhibited to do so because of the large size and proximity to the walkway.

There is also potential for environmental problems, as the wastewater can be spilled, and oil and gas could be leaked onto the street or washed down sewer drains to the ocean.

As a resident of Fairway Park living on Bradford Way, very close to where these RVs would be parked, I have concerns for the safety of my neighborhood as well.

I strongly appeal to the Commission to reverse this decision.

Thank you,
Paige Saunders
Bradford Way, Fairway Park

From: [Kenneth G Valdez](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)
Date: Friday, July 22, 2022 11:29:05 AM

NO to RV parking on Bradford Way at the Sharp Park Golf Course!

When RVs are parked there, there are many times we would possibly hit the RV as they stick out so much or the people have their doors open etc that it forces cars driving through, move over to the far left, sometimes almost potentially hitting the oncoming car/traffic from the other side.

Not only RVs parked on the street obstructs with the flow/space of traffic safety in that area, it is also a major eye sore coming off the sharp park exit. The neighborhood would have random neighbors who stay, possibly trash the area, then move on, as they do not truly live in the area. RV'ers who stay for a short term period do not care for an area the same as the people who permanently live in the area.

This is my opinion coming from a Fairway Park resident.

Best Regards,
- KenValdez

From: NorthCentralCoast@Coastal
To: [Rexing, Stephanie@Coastal](mailto:Rexing.Stephanie@Coastal); [Ringuette, Oceane@Coastal](mailto:Ringuette.Oceane@Coastal)
Subject: FW: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)
Date: Friday, July 22, 2022 2:38:11 PM

From: Frank Vella <frank@starboardnet.com>
Sent: Friday, July 22, 2022 2:24 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)

I Believe that this “safe parking Program” is not well thought out. Those who have opposed the city of Pacifica’s plan to deal with the issue of homeless people parking on the streets turn the effort to help those in need by the city into a fiasco that hurts those who need the help most. Homeless should not be parking on the city streets, it is not environmentally smart, not public safe and not safe or healthy for those trying to live in their vehicles.

The situation with people who are unknown to others residing in vehicles parked on city streets alerts us to numerous issues that are unsafe to children and residents of all types.

The Bradford Way/Sharp Park golf course should be off limits to parking vehicles of a RV type nature and off limits to those using their vehicles as a home. It’s just not the place to do this.

Frank Vella

Frank@FrankVella.com

650-464-8062

Ringuette, Oceane@Coastal

From: jim wagner <wags903@msn.com>
Sent: Saturday, July 23, 2022 12:43 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)

Dear Commissioners,

I had the privilege of serving on the City of Pacifica Planning Commission from 2001-2005. We had our fair share of projects come before us. When called for, we always leaned towards “will this harm the environment or our ocean”. The need to keep our coastline safe was of great importance to me.

Pacifica’s Safe Parking Program will harm our environment and has the potential to impact the ocean negatively.

Mobile homes have no business parking on the streets for an extended period of time. Our storm drains flow to the ocean and these vehicles, especially older motor homes, leak oil and other fluids. That oil will wash into our storm drains and out to the ocean impacting oceanic wildlife and the quality of life for visitors to the beach.

These large vehicles will also impede access to our coastal trails and create dangerous situations when bicyclist and pedestrians are forced to navigate around these obstacles.

I urge the Commission to carefully weigh the negative environmental impacts of this Parking Program when moving forward.

Thank you,

Jim Wagner
Pacifica, Ca 94044

Sent from [Mail](#) for Windows

Ringuette, Oceane@Coastal

From: Marissa Wat <marwat15@gmail.com>
Sent: Saturday, July 23, 2022 10:56 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)

Hello,

I'm a Pacifica resident and I am against this location for this project. This will impede a sidewalk that is used by many people everyday. Also, this will create a dangerous passage for many bicyclists along this route by blocking the road. There are many other areas in Pacifica that can be used for this program. For example, the same motorhomes that are parked there now had parked for years in the Rockaway beach parking lot- why not use that lot for them? There are garbage cans there at least. The amount of trash that will pile up along the golf course will create an insanitary situation.

Many families with small children use this sidewalk and road to bike on. Please consider the safety of your tax paying residents in the near by neighborhood.

Also, the sidewalk desperately needs to be redone.

Thanks for your consideration.

Sent from my iPhone

From: [Chuck Waters](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7a - Appeal No. A-2-PAC-22-0029 (City of Pacifica Safe Parking Program, Pacifica)
Date: Thursday, July 28, 2022 9:15:30 AM

I love camping and have an RV in Pacifica.

We do not want RV parking in a residential neighborhood bordering a public golf course. This is a road not a parking lot and the location is right next to the exit of highway 1 which is dangerous.

There are no services or utilities for RVs to dump sewage, fill water, shower, dispose of trash, etc. on the side of the road (Bradford Way).

Pacifica has a real RV park less than a mile away on the north side of town, San Francisco RV Park. This is where RVs currently park/camp and use amenities. This is a wonderful RV park so I do not see why the city is looking to undermine a local business and create a potential traffic hazard and sanitary problem.

RVs also park in our state beach parking lots during the day.

I would ask what is the problem that the two RV sites are attempting to solve? The RVs already have safe areas to park and camp in our beautiful costal city.

Chuck Waters