

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
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F7b

A-2-PAC-22-0031 (Pacifica Safe Parking Program – San Pedro Ave)

August 12, 2022

CORRESPONDENCE 2



Scenic Pacifica
Incorporated Nov. 22, 1957

CITY OF PACIFICA
Planning, Building, and Code Enforcement
540 Crespi Dr. • Pacifica, California 94044-3422
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August 8, 2022

The Honorable Donne Brownsey, Chair
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
(415) 904-5202

Subj: Substantial Issue Determinations for Appeal Nos. A-2-PAC-22-0031 and A-2-PAC-22-0031, City of Pacifica Temporary Safe Parking Program on Bradford Way and San Pedro Avenue (August 2022 Meeting, Agenda Items F7a and F7b)

Dear Chair Brownsey:

The City of Pacifica (“City”) enacted an ordinance to authorize parking of certain oversized vehicles in the public right-of-way across Pacifica, including areas inside and outside the Coastal Zone, as part of the Temporary Safe Parking Program (“TSPP”).¹ The City has issued coastal development permits (“CDPs”) to authorize three TSPP parking locations in the Coastal Zone, comprised of five total spaces. Two of the TSPP parking locations have been appealed to the California Coastal Commission (“CCC”) and are the subjects of the two above-referenced substantial issue determinations. These parking locations each have two spaces. The third TSPP parking location in the Coastal Zone, comprised of one space, is the subject of a separate local appeal to the Pacifica City Council that is scheduled to be heard on August 8, 2022.

The above-referenced appeals are without merit and have not raised any substantial issues related to Coastal Act consistency. CCC staff has acknowledged as much in its analysis. The City’s actions to issue the CDPs for the TSPP were supported by substantial evidence. Moreover, the CDPs issued by the City would be consistent with Pacifica’s certified Local Coastal Program, and contained conditions of approval to protect coastal resources including measures to prevent illicit dumping of sewage and to ensure safe disposal of trash. Nevertheless, CCC staff has attempted to expand the CCC’s substantial issue determinations to consider matters that were not the subject of the City’s issuance of the CDPs to implement the TSPP. Specifically, CCC staff has claimed that the CCC should find a substantial issue with both City-issued CDPs to address its concerns with a separate action by the City to enact an ordinance on January 27, 2020, to regulate oversized vehicle parking (“OSV Ordinance”).²

The appeals should be denied for several reasons. First, alleged impacts of the City’s OSV Ordinance are the sole basis for CCC staff’s recommendation that the CCC find a substantial issue. However, the CCC lacks appellate jurisdiction to approve, modify, or deny the OSV Ordinance in connection with the appeals. Second, the appeals do not raise a substantial issue. Finally, even if the CCC has jurisdiction to consider the OSV

¹ City of Pacifica [Ordinance No. 873-C.S.](#), adopted on March 14, 2022.

² City of Pacifica [Ordinance No. 866-C.S.](#), adopted January 27, 2020.

Ordinance in the context of the above-referenced appeals (it does not) CCC staff's contention that the OSV Ordinance is "development" that requires a CDP is incorrect.

1. The CCC Lacks Jurisdiction To Consider the OSV Ordinance in Connection with the Appeals

The Coastal Commission's jurisdiction extends only to the review of the "development" on appeal. (*Schneider v. Cal. Coastal Comm'n* (2006) 140 Cal.App.4th 1339, 1345; 14 CCR § 13113.) Indeed, the CCC may only "approve, modify, or deny [the] proposed development" that is the subject of the appeal. (Pub. Res. Code § 30625(a).) Here, CCC staff determined that (1) "the City-approved project should not significantly alter or affect existing access"; and (2) "Appellant's habitat contentions do not raise a substantial Coastal Act or LCP issue." Nevertheless, CCC staff recommended that the CCC find a "substantial issue" over concern that the City's years-old OSV Ordinance may adversely impact the "unsheltered community."

However, CCC staff's opinion that the TSPP and OSV Ordinance are "inextricably linked" is erroneous. The OSV Ordinance was lawfully adopted in January 2020 and is being enforced within the Coastal Zone to regulate OSV parking.³ Relevant facts pertaining to the OSV Ordinance include the following:

- The OSV ordinance's 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. Unregulated parking of OSVs jeopardizes public health and safety of both OSV and non-OSV visitors to the Coastal Zone due to the increased potential for collisions.
- 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. Coastal visitors operating all types of vehicles that may lawfully operate on roads in California would continue to enjoy parking access in the Coastal Zone within Pacifica for up to 72 hours in any given parking space.
- The City has prepared a map of allowable OSV parking locations.⁴ The map demonstrates 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.

The TSPP, in contrast, was enacted by ordinance in 2022. Unlike the OSV Ordinance – which prohibits oversized vehicle parking on certain streets – the TSPP Ordinance allows program participants (i.e., members of the unsheltered community) to park in designated spaces for up to 29 days while pursuing long-term housing opportunities. Thus, the primary impact of a substantial issue determination on the appeals is that opportunities for lawful habitation as part of the TSPP would be delayed for at least four individuals/families until the appeals are resolved.

³ The City agreed to not enforce the OSV ordinance citywide upon issuance of a preliminary injunction by the San Mateo County Superior Court based on the stipulation of the parties in the case of *Geary et al. v. City of Pacifica*, Case No. 3:21-cv-01780. The City resumed OSV ordinance enforcement citywide upon the launch of the TSPP program in July 2022. The TSPP requires twice-monthly sewage servicing of program participants' OSVs by a mobile dumping station. The staff report states "bimonthly" servicing which could be incorrectly interpreted to mean every two months.

⁴ Interactive OSV Ordinance [parking location map](#).

The Planning Commission did not consider a CDP for the OSV Ordinance (which, as explained below, is not a “development”). It considered “developments” comprised of two designated oversized parking spaces on Bradford Way (Appeal No. A-2-PAC-22-0029) and two designated oversized vehicle parking spaces east of San Pedro Avenue (Appeal No. A-2-PAC-22-0031). Accordingly, the Commission lacks jurisdiction in this appeal to “approve, modify, or deny” the OSV Ordinance. (See Pub. Res. Code § 30625(a).)

2. The Appeals Do Not Raise a Substantial Issue

Regardless, the appeals do not present a substantial issue. When determining whether an appeal raises a substantial issue, the Commission may consider the following factors: (1) the degree of factual and legal support for the local government’s decision; (2) the extent and scope of the development as approved or denied by the local government; (3) the significance of the coastal resources affected by the decision; (4) the precedential value of the local government’s decision for future interpretations of its local coastal program; and (5) whether the appeal raises only local issues as opposed to those of regional or statewide importance. (14 CCR § 13115(c)(1)-(5).) The “developments” on appeal do not raise a substantial issue under any of these factors.

First, the CCC staff report admits that the “developments on appeal” – i.e., the reservation of two oversized vehicle parking spaces on Bradford Way and east of San Pedro Avenue – “should not significantly alter or affect existing access” and do not raise “substantial Coastal Act or LCP issue[s]” with respect to habitat impacts. Concern over the OSV Ordinance’s impact on the “unsheltered community’s” ability to park oversized vehicles in the coastal zone is the sole basis for CCC staff’s recommendation that this factor weighs in favor of finding a substantial issue. However, the pending appeals challenge the City’s effort to reserve four public parking spaces in the Coastal Zone for the “unsheltered community.” The OSV Ordinance, which is not the subject of the appeals, is the law that restricts oversized vehicle parking in the City. As explained herein, the CCC lacks jurisdiction to review the OSV Ordinance in this appeal.

Second, the extent and scope of the “development” approved by the Planning Commission does not raise a substantial issue. As the CCC staff report admits, the Bradford Way “development is limited to two 30-foot by 10-foot designated parking spaces with a 10-foot no parking buffer at each end.”⁵ It “encompass[es] an 800 square-foot area on an already paved street where vehicle parking is currently occurring.” Similarly, the San Pedro “development is limited to two 30-foot by 10-foot designated parking spaces” occupying “in total . . . a 600 square-foot area on an already partially paved area where general public parking currently occurring.” The impact of these “developments” on coastal access is *de minimis* by any standard.

Third, as the CCC staff report admits, the developments on appeal will not have a significant impact on coastal resources. Indeed, the CCC staff reports admit that the proposed projects are located on paved streets/parking areas that already allow for public parking, and the nearest coastal access points and habitat areas are sufficiently far enough away that the City-approved developments are unlikely to affect those resources. Again, the OSV Ordinance is the sole basis for CCC staff report’s recommendation that this factor weighs in favor of finding a substantial issue. As explained above, the Commission lacks jurisdiction to review the OSV Ordinance in this appeal.

⁵ The Bradford Way parking location would allocate approximately 70 feet of public right-of-way to the TSPP, not 80 feet as indicated in the staff report. The spaces total 60 linear feet with a condition of approval requiring a buffer area on either side of the spaces of at least 5 linear feet.

Fourth, the City's approval of "developments" that reserve four existing parking spaces for oversized vehicle parking has no precedential value for its future interpretations of its Local Coastal Program. Despite its contrary conclusion, the CCC staff report offers no analysis or explanation for how the City's approval of the developments has any precedential value whatsoever. The bare assertion of precedential value does not make it so.

Finally, the City's approval of the "developments" on appeal does not raise issues of regional or statewide significance. Again, the OSV Ordinance is the sole basis for CCC staff's recommendation that this factor weighs in favor of finding a substantial issue. As explained above, the Commission lacks jurisdiction to review the OSV Ordinance in this appeal.

In this case, none of the factors weigh in favor of a determination that the appeals of the "developments" subject to the City-issued CDPs present a substantial issue. Accordingly, it would be an abuse of discretion for the CCC to find a substantial issue.

3. The Coastal Act Does Not Require the City to Obtain a CDP for the OSV Ordinance

Finally, both CCC staff reports repeatedly allege that the City violated the Coastal Act by adopting the OSV Ordinance without obtaining a CDP. However, CCC staff failed to disclose that the City has disputed their assertion that the OSV Ordinance is a "development" that requires a CDP since 2019, and the Commission has taken no enforcement action against the City since the OSV Ordinance was adopted in 2020.

In December 2019, the City received correspondence regarding CCC staff's position that the then-proposed OSV Ordinance was a "development" requiring a CDP because it would result in a "change in the density or intensity of use of land." (Pub. Res. Code § 30106.)

The City disagreed. In an email dated January 23, 2020, the City explained that the OSV Ordinance is a traffic ordinance that merely prohibits oversized vehicles from parking at locations that present a public safety hazard. Specifically, the OSV Ordinance prohibits oversized vehicles from parking (1) on public streets with a road width of less than forty (40) feet of width; (2) within one hundred (100) feet of any uncontrolled intersection; (3) at locations that encroach on an identified bicycle lane with defined boundaries; (4) on any public streets that restrict the travel lane to less than 10 feet wide; and (5) at locations that encroach on a public bus route. Land previously used for parking will continue to be available for parking. Because the OSV Ordinance does not "change the density or intensity of [the] use of land" it does not require a CDP.

CCC staff responded by reiterating their position that "implementation of the [OSV] ordinance will include changes to the intensity of use of land and access to water under the definition of development in both the Coastal Act and the City's certified LCP." Specifically, CCC staff argued that implementation of the OSV Ordinance would adversely impact access to the coast because "14 of the 21 access points outlined in the Access Component of the City's certified LUP overlap with roads specified in the" Ordinance.

In response, the City carefully reviewed the access points set forth in the Access Component of the City's certified local coastal land use plan ("LCLUP") and other areas of the City's certified LCLUP relating to parking. The City then compared those access points to the OSV Ordinance and determined that (1) 18 of the 21 access points identified in the City's LCLUP provide direct access to the coast; and (2) oversized vehicle parking remains available on the street or in a public parking lot at all 18 of those access points.

Substantial Issue Determinations for Appeal Nos. A-2-PAC-22-0031 and A-2-PAC-22-0031, City of Pacifica
Temporary Safe Parking Program on Bradford Way and San Pedro Avenue (August 2022 Meeting, Agenda Items F7a
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The OSV Ordinance does not eliminate, increase the cost of, or otherwise make unavailable a single public parking space in the Coastal Zone. Moreover, while it restricts oversized vehicle parking in certain locations for safety reasons, the City ensured that parking for oversized vehicles remains available on a public street or in a public parking lot at all access points that provide direct access to the coast.⁶ Thus, the OSV Ordinance will not result in increased or decreased automobile or pedestrian traffic in the Coastal Zone. (Compare with *Surfrider Foundation v. Martins Beach 1, LLC* (2017) 14 Cal.App.5th 238, 252 [erection of gate obstructing public access was “development” under Public Resources Code section 30106 because it decreased intensity of use of water].) Because the OSV Ordinance will not change the intensity of the use of land or water in the Coastal Zone, it is not a “development” that requires a CDP.

CCC staff’s suggestion that the Commission should consider whether the OSV Ordinance requires a CDP in the context of these appeals is improper and would deny the City due process. The OSV Ordinance was not the subject of the CDP proceedings addressed in the appeals. Therefore, it would be inappropriate to utilize the substantial issue and subsequent appeals processes as a preemptive component of Coastal Act enforcement.

Thank you for considering the City’s comments in this matter. Please contact me should you have any questions: kwoodhouse@pacificagov or (650) 738-7409.

Sincerely,



Kevin Woodhouse
City Manager

⁶ Interactive OSV Ordinance [parking location map](#)



August 5, 2022

Via Email Only

Re: Appeals A-2-PAC-22-0029 and A-2-PAC-22-0031

To the California Coastal Commission:

The undersigned are counsel for Plaintiffs in the litigation entitled *Geary, et al. v. City of Pacifica*, Case No. 21-cv-1780 in the United States District Court for the Northern District of California (the "Lawsuit"). We write with respect to the captioned appeals now pending before the Commission (the "Appeals").

Background of *Geary* Lawsuit & Settlement

On March 15, 2021, Plaintiffs filed a Lawsuit which challenged Pacifica's Oversized Vehicle Ordinance, specifically the December 9, 2019 version of Pacifica Ordinance No. 855-C.S., (the "Ordinance" or "OVO"). Plaintiffs challenged the OVO on a number of grounds, alleging that the Ordinance and the City's enforcement thereof adversely and unlawfully targeted and impacted vehicularly housed persons in Pacifica including people with disabilities and other historically marginalized groups. On November 29, 2021, the Plaintiffs and the City entered into a negotiated Settlement Agreement of the Lawsuit (the "Settlement"). This Settlement Agreement is publicly filed. *Geary, et al. v. City of Pacifica*, Case No. 21-cv-1780 (Dkt. No. 59-1). The terms of the Settlement included the entry of a stipulated injunction by the Court and required the City to undertake a number of affirmative steps benefitting vehicularly housed persons, including the establishment of a thirteen-space Temporary Safe Parking Program ("TSPP"). Under the terms of the Settlement, Pacifica can set the locations of the parking spaces in the TSPP. As set, four of the thirteen parking spaces established under the TSPP (two on Bradford Way, and two on San Pedro Way) are the subjects of the Appeals.

Settlement Confers Significant Benefit on Vehicularly Housed Pacificans

As compared to enforcement of the Ordinance before the Lawsuit was filed, the Settlement confers a significant benefit on vehicularly housed Pacificans. It is our position, therefore, that, given the existence of the Ordinance, the Settlement is in line with the environmental justice principles that the Commission is required to pursue. The Settlement significantly mitigates the Ordinance's impact on unhoused Pacifica residents, including by requiring the City to give clear guidance as to where "oversized vehicles" can park, to provide dumping and trash services, and to create the TSPP. Plaintiffs believe that temporary safe parking programs, such as the broadly defined TSPP required by the Settlement, confer significant benefits to vehicularly housed individuals and are therefore in line with the commission's Environmental Justice Principles. For this reason, should the Commission determine that the Ordinance does not present a

Substantial Issue, the TSPP should not be curtailed by denying the permits for the four TSPP spaces currently named in Appeals A-2-PAC-22-0029 and A-2-PAC-22-0031.

We express no view as to the Ordinance, the Participant Bill of Rights/Onsite Code of Conduct, or any other items addressed in the Commission's report with respect to the Commission's mandate or principles, or any other matters discussed in the Staff Reports issued in connection with the Appeals.

Respectfully submitted,

Grayce Zelphin

Thomas Zito

Stacey Hawver

Co-Counsel for Plaintiffs

Ringuette, Oceane@Coastal

From: carolyn jaramillo <cderby37@gmail.com>
Sent: Friday, August 5, 2022 9:04 AM
To: NorthCentralCoast@Coastal
Subject: Public comments August 2022

North Central Coast
Public Comment for August 2022
Items 7a & 7b Pacifica's Safe Parking Program

Honorable Commissioners:

I am writing to request you support the sites in question for Pacifica's Safe Parking Program. This program is so needed by the unhoused people who are living in motorhomes because they cannot afford the high rents in Pacifica. They have connections here in Pacifica and want to stay here for many reasons. This program is being operated by the Pacifica Resource Center and is just getting started after many delays. It is a good program designed to assist people obtain more permanent housing.

I am a member of Pacifica Housing 4 All, a nonprofit grassroots organization that has been advocating for our unhoused population for six years. We have worked with the Resource Center to set up this program, and we have every confidence in Anita Rees, Executive Director, and her staff. They have a proven track record and are respected by the Community for their competence and compassion. I have walked and driven by motorhomes that are in this program and can see that they are being good citizens taking care of the area. I understand that some people in our city object to the "looks" of motorhomes, and I know some people have spoken disrespectfully against the people living in them out of fear.

I feel the Safe Parking Program can be successful and alleviate these fears if it is given a chance. Again, I urge you to support these sites for the program.

Thank you for your work and for your consideration.

Peace,
Carolyn Jaramillo
524 Manor Drive, Pacifica

Sent from my iPad

Ringuette, Oceane@Coastal

From: Delia McGrath <deliaforpeace39@gmail.com>
Sent: Friday, August 5, 2022 11:20 AM
To: NorthCentralCoast@Coastal
Cc: Delia McGrath
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 California Coastal Commission,

My name is Delia McGrath, a Pacifica resident/homeowner since 1978. I am an advocate in our community, committed to supporting the health, safety and well-being of our beautiful city, to ensuring its environmental integrity and to responding to the needs of all of our residents including those whose housing security depends on having safe parking places for their motor homes. Today I am writing to ask your full support of the Safe Parking Program designated spaces, when you consider the appeal at your August 12 meeting — agenda items 7a and 7b.

Pacifica's Safe Parking Program is being implemented by Pacifica Resource Center, our local nonprofit community service center, an organization in whom I have the greatest confidence. Those sites, challenged in these appeals, were specifically chosen because they do not compromise our health and safety, nor do they have a negative environmental impact, as is suggested in several comments posted. The City staff chose these sites after a thorough assessment of city streets. These sites are completely suitable for the purposes of the Safe Parking Program. The sites allow residents to park safely while working with Pacifica Resource Center with the goal of finding a path to permanent housing. I ask you to reject the appeal and vote to sustain these designated spaces as part of our excellent Safe Parking Program in Pacifica.

I wish to acknowledge the Commission's previous decision to continue coastal access to motor homes in Santa Cruz and show consistency in your actions to continue coastal access to motor homes in Pacifica. Thank you for your kind consideration!

Sincerely,

Delia McGrath
Pacifica resident/homeowner since 1978

Ringuette, Oceane@Coastal

From: Suzanne Moore <suzyqettu2@gmail.com>
Sent: Thursday, August 4, 2022 4:54 PM
To: NorthCentralCoast@Coastal
Cc: Suzanne Moore
Subject: Public Comment on August 2022 Agenda Item Friday 7b - Appeal No. A-2-PAC-22-0031 (City of Pacifica Safe Parking Program, Pacifica)
Attachments: Hot Docs.pdf; Reply Documents.pdf

Honorable Commissioners,

I support the staff recommendation to:

- investigate Pacifica and our process surrounding our community's Oversize Vehicle Ordinance and Safe Parking Program,
- study whether our unhoused are an Environmental Justice Community.

I have concerns about the past and current City treatment of our unhoused. I provide an attachment of a public record request, communication from city emails, which provides insight on the City's early enforcement of the Oversize Vehicle Ordinance.

I have concerns about unintended consequences of this investigation which I hope you can address.

1. Could your investigative process either slow or overwhelm the capacity of the Pacifica Resource Center to assist our unhoused to permanent housing?
2. Could your investigation potentially generate further ill will in Pacifica that might put our unhoused neighbors at risk?
3. Could this investigation antagonize a working relationship between our City and the Coastal Commission that could distract from solution building?

How can we mitigate these risks while ensuring that unhoused people have equitable access to the coast in Pacifica? Could the Commission speak to these concerns as soon as possible so our community can best understand? Thank you.

--

Suzanne Moore

Home 650.557.0867

Cell 650.243.7310

Ringuette, Oceane@Coastal

From: David Rokosky <jorokosky@gmail.com>
Sent: Friday, August 5, 2022 11:00 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7b - Appeal No. A-2-PAC-22-0031 (City of Pacifica Safe Parking Program, Pacifica)

Dear Coastal Commission,

I am writing to request that the Coastal Commission vote to support the two oversized vehicle spots designated for the City of Pacifica Safe Parking Program. As a resident of the Coastside I am acutely aware of the lack of available housing and the urgent need for both short-term and long-term solutions to the housing crisis. The Pacifica Safe Parking Program is a short-term program to provide immediate and safe housing for some individuals while additionally providing them with a pathway to permanent housing. There are no identified environmental impacts from these two sites, and there remains public access to the Coastal Trail and other amenities.

Sincerely,
Joanne Rokosky Dear Coastal Commission,

Sent from [Mail](#) for Windows

Ringuette, Oceane@Coastal

From: Julie Starobin <juliestarobin@gmail.com>
Sent: Thursday, August 4, 2022 1:38 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item, Friday, 7a and 7b. Appeal #A-2, Pac-22-0029 and 0031

To Coastal Commission members:

I have lived in Pacifica for 11 years and am a homeowner. I have been a supporter of a Safe Parking Program for Pacifica for many years and only wish it could cover more people. Because it has become prohibitively expensive to live in Pacifica, many long-time residents have been priced out and end up living in vehicles just to stay close to family and friends. I have participated in many attempts to convince the City Council to set up a Safe Parking area as has been done in other cities. Unfortunately nothing has moved the City Council except the lawsuit which resulted in 13 spaces being allowed.

The Pacifica Resource Center is an excellent and experienced organization fully capable of administering the Safe Parking program with the goal of helping find permanent housing for unhoused people and supporting those who have no other choices.

The 13 spots for this program were chosen carefully. They should not be disallowed because a few people don't like having motor homes in their neighborhood. The Commission has supported access for motorhomes on the coast in other areas. Please deny the appeal and support the sites that were chosen.

Thank you,

Julie Starobin, Pacific Manor

Ringuette, Oceane@Coastal

From: Nancy Tierney <nhtierney@gmail.com>
Sent: Friday, August 5, 2022 12:42 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2022 Agenda Item Friday 7b - Appeal No. A-2-PAC-22-0031 (City of Pacifica Safe Parking Program, Pacifica)

Commissioners:

I am writing to express my support for the safe parking spaces designated by the City of Pacifica to allow short-term use by families in need of housing. I live just blocks from 5 of the spaces already in use and regularly walk by them. From all appearances, the owners respect the terms of use, parking in the marked locations and maintaining the areas. In contrast I routinely pick up trash on Pacifica beaches and nearby neighborhoods, collecting all manner of refuse including clothing, personal hygiene items, containers, and cigarette butts. Some of the trash comes from people parked for short periods who have nowhere to go, and in the absence of proper facilities for collecting refuse. Establishing a program for people who are unhoused, ably managed by the Pacifica Resource Center, makes a lot of sense. Please recognize that these are our neighbors.

thank you.
Nancy Tierney