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W16a

LCP-6-DMR-21-0081-2 (Parking Adjustments)

May 10, 2023

CORRESPONDENCE

Public Comment on May 2023 Agenda Item Wednesday 16a - City of Del Mar LCP Amendment No. LCP-6-DMR-21-0081-2 (Parking Adjustments).

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Wed 5/3/2023 9:13 AM

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Dear Chair Brownsey and Commissioners:

"They paved paradise, put up a parking lot." - Joni Mitchell

Too often the Commission has equated driving and parking with access to the coast. According to the California Air Resources Board (CARB), however, Californians must begin cut back on our dependence on the automobile if the state is to have any hope of reaching its climate goals. (CARB, 2022 Scoping Plan for Achieving Carbon Neutrality, p.192 <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf>.) CARB specifically calls out reductions in parking requirements as a priority greenhouse gas reduction strategy. (See 2022 Scoping Plan, Appendix D, pp. 11, 22-23 <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf>.) Since the California Coastal Act was enacted almost half a century ago, it has called for facilitating public transit, walking, and bicycling and for minimizing vehicle miles traveled and energy consumption. (Pub. Resources Code, §§ 30252, 30253(d).)

Despite the threat that climate disruption poses to a wide range of coastal resources - including the beaches whose parking the Commission so assiduously protects - land use and transportation policies in the coastal zone focus almost entirely on making driving and parking in the coastal zone as cheap and easy as possible with only occasional mostly symbolic gestures of support for other modes. The result of this is both unsurprising and devastating to the climate, the environment, and the air we breathe: even urbanized areas of the coast that could be conducive to walking, bicycling, and transit continue to be dominated by and dependent upon the automobile.

The City of Del Mar's proposed LCP amendment is one very modest step in the direction of cutting back on excessive parking requirements that promote more driving, that undercut transit, that create hostile and barren pedestrian environments, and that generate traffic that imperils bicyclists. The staff recommendation would give partial temporary approval for Del Mar's parking reform, but loads it down with unnecessary and burdensome multi-year monitoring and reporting requirements whose primary goal is to protect parking. Left unexamined is how this effort to facilitate driving jibes with either the state's climate goals or the mandates of the Coastal Act.

The staff recommendation goes further astray in prohibiting the City from extending its proposed parking reforms to the City's "Beach Commercial" zone. The Beach Commercial zone currently consists almost entirely of surface parking lots: a large public parking lot, parking lots for three restaurants, and another large parking lot next to the former train station. Few places more aptly qualify for Joni Mitchell's famous refrain than the Beach Commercial zone in Del Mar. The staff recommendation's opposition to any effort to allow businesses there to provide somewhat less parking than is currently required is simply puzzling - and contradictory to the Coastal Act's requirements to reduce driving and promote other modes of transportation.

The proposed suggested modifications do include some language about facilitating transit and reducing vehicle miles traveled, but they do not adequately acknowledge or address how parking supply is itself a major factor in people's decision about how to move about. Policies that on their face appear both to preserve parking supply and encourage transit ridership will in reality have only one effect: perpetuating the status quo where the automobile is the overwhelmingly dominant mode of transportation. It's long past time for the Commission to shift its focus towards making more environmentally sustainable modes of transportation viable and attractive options.

The Commission should therefore make the following changes to staff's proposed suggested modifications (language deleted from suggested modification shown in strikethrough, added language is underlined, retained language from staff's recommendation shown in plain text):

Adopt suggested modifications nos. 1 and 6 as recommended by staff.

Revise suggested modification no. 2 to read: ~~"Provide parking for residents, visitors and employees as part of new development in accordance with the City's certified Implementation Plan. The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, and (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation."~~

Rationale: The staff recommendation's proposed language creates an across-the-board requirement for development to provide parking that is inconsistent with Coastal Act sections 30252 and 30253. The proposed language simply tracks the relevant language of Coastal Act section 30252, which the LUP currently omits.

Revise suggested modification no. 3 to read: ~~"Provide and manage~~ Regulate the supply, pricing, and management of parking so that it is reasonably available when and where it is needed, without significantly impacting coastal resources or public access to coastal amenities and facilities, and to minimize energy consumption and vehicle miles traveled and facilitate public transit and other non-automobile modes of transportation."

Rationale: The revisions to this suggested modification clarify that parking regulations should comply with all relevant Coastal Act requirements, including sections 30252 and 30253.

Revise suggested modification no. 4 to read: "To help reduce parking demand, consider flexibility in parking requirements such as parking cash-out programs, shared parking opportunities, parking pricing strategies, improved public transit services and facilities, reduced auto ownership, provision of car, bicycle or scooter sharing opportunities, or other means, provided that public access is not reduced."

Rationale: Parking cash-out programs whereby employers pay for transit passes or other non-automobile commuting expenses in lieu of free or reduced parking are an effective way to reduce automobile commuting, but the state law regarding parking cash-out programs is frequently overlooked. (See Health & Safety Code, § 43845; <https://ww2.arb.ca.gov/resources/documents/californias-parking-cash-out-law>.) Parking pricing strategies, such as unbundling the cost of parking from the cost of housing or commercial tenancies

and varying the price of parking depending on demand are also ways to reduce parking demand, especially during peak demand periods.

Revise suggested modification no. 5 to read: "Reduce the amount of land devoted to parking through measures such as parking demand reductions, parking structures, stacked parking, shared parking, and managed public parking while still providing appropriate levels of parking to maintain access to the shoreline, taking into account how parking supply, pricing and management affect vehicle miles traveled, transit ridership, and the safety and attractiveness of walking and bicycling."

Rationale: The supply, management and pricing of parking affect both demand for parking and use of other modes of transportation. Because the staff recommendation refers to "appropriate levels" of parking, it should refer to relevant Coastal Act factors for determining the appropriate levels.

Delete suggested modifications nos. 7-11.

Rationale: As discussed earlier in this letter, these modifications unnecessarily limit the geographic scope and the duration of the City's proposed LCP amendment. Although staff's proposed suggested modifications to the LUP include some provisions regarding reducing parking demand and encouraging non-automobile modes of transportation, the focus of modifications 7-11 is primarily on preserving an abundant supply of parking. Given the modest scope of the LCP amendment, given that the City has already conducted a study of parking demand in the City's commercial districts and of parking requirements in similar areas of other nearby jurisdictions, and given that preserving existing parking patterns is likely to perpetuate existing transportation patterns that are inconsistent with the state's climate goals and with the Coastal Act, the Commission should allow the LCP amendment to go into effect without imposing geographic or time limits.

The Commission's draft Sustainability Principles call for the Commission to take action to reduce the greenhouse gas emissions that imperil a host of coastal resources. This LCP amendment is an opportunity for the Commission to begin to do that.

Thank you for your consideration of my comments.

Sincerely,

Christopher Pederson