

CALIFORNIA COASTAL COMMISSION

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Sabrina Sihakom
County Development Agency Planning Division
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Subject: Marin County Coastal Development Permit P2515 at Brighton Avenue, Wharf Road, and Park Avenue in Bolinas, Marin County

Dear Ms. Sihakom,

Thank you for allowing Coastal Commission staff the opportunity to comment on the proposed development at Brighton Avenue, Wharf Road, and Park Avenue in Bolinas, Marin County. The requested coastal development permit includes the proposal to restrict oversized vehicle parking between 11pm and 5am along both sides of the above listed roads. The proposal includes signage, monitoring, and enforcement in coordination with the Marin County Sherriff. Based upon the project referral, the proposed development appears to be inconsistent with provisions of the Coastal Act embedded in the LCP; including that the location of new development should maintain and enhance public access to the coast by providing adequate parking facilities, consistent with Coastal Act Section 30252. In short, approving a coastal development permit for the proposed parking restrictions raises consistency issues with LCP public access and recreation guidance, with the Coastal Act providing further clarification of the LCP intent to maximize access to beaches, restrict new development from interfere with the public right of access, and protection of low cost coastal access.

Project Need and Problem Definition

Existing regulations require any vehicle to be moved from its location on Brighton Avenue, Wharf Road, and Park Avenue after 72 hours. According to the project description, this regulation has proven difficult to enforce because after 72 hours, vehicles simply move to another nearby site for another 72 hours, reducing parking turnover and impeding the general public's use of the parking area. Residents cite lack of day parking for daytime use and beach access, however the project intends to eliminate parking for oversized vehicles from 11pm to 5am. While this may solve the enforcement problem during nighttime hours, it is not clear how it would ensure that those same oversized vehicles will not return to the area at 5am, park all day, and impact the same parking area during the remaining 18 peak-beach use hours. Please clarify how the proposed restrictions will address the identified problem. We encourage the applicant to identify a project that will be responsive to the parking issues, in order to assure the program is narrow as possible so as to not create unintended impacts to public access inconsistent with the Coastal Act and Marin LCP access policies. Based on the project description, it appears that under the existing 72 hour parking restrictions, vehicles relocate to neighboring parking spaces to re-commence a new 72 hours of parking, and especially impact day use parking. It does not

appear that uninhabited or abandoned vehicles would fall into this category. As such, please additionally explain how the County plans to address such uninhabited or abandoned vehicles.

Data Collection

In addition to the data that has been collected to date, it seems valuable to assess whether visiting campers or permanent inhabitants of oversized vehicles are responsible for committing parking violations described in the project description. Such data may serve to better inform a narrow solution to the existing issue. For example, if there were evidence that visiting campers are violating existing regulations, the resulting program would have a significantly different approach and goals than if the data collection reflected that those using vehicles for housing are violating the parking restrictions. As described in more detail below, the County may benefit from examining additional camping or safe parking opportunities in coordination with other County departments.

Project Alternatives

Our staff previously suggested that County staff consider a permitted overnight parking program for oversized vehicles. Such a program could reduce parking demand during peak daytime hours by limiting oversized vehicle parking to the low-demand hours, such as between 9pm and 6am. Thus, it could reduce the burden on those seeking daytime access, while providing those using vehicular shelter the opportunity to take advantage where nighttime parking is available. This option seems to have been deemed infeasible, because no agency volunteered to administer the program. We urge the County to reconsider such a program, coordinating this effort with multiple County departments, including Marin County Sheriff's Department, Public Works, Planning, Health and Human Services, and Housing Authority, to guarantee that environmental justice concerns are addressed. Individuals impacted by the proposed project will likely be squeezed out of the Bolinas community and into another nearby neighborhood. As such, we also encourage the County to explore options for allowing such a program to existing in other parts of the County, where the demand for nighttime parking is also especially low.

Please note that the restriction will likely result in an inequitable burden on certain populations, such as on those residing in their vehicles. For many, the economic impact of a citation or being towed can be devastating, particularly when the vehicle serves as a person's home, and access to their shelter and personal belongings is eliminated. The project description mentioned a number of existing programs aimed at helping to lessen Marin County's homeless population, yet related none of them to the existing problem. Please clarify how the "Housing First" program, implemented by Marin County in 2017, would directly provide assistance to the individuals cited or displaced by the proposed regulations assuring environmental justice impacts are avoided, minimized, and mitigated for consistent with the Coastal Act.

Project Monitoring

Rather than an ordinance to permanently prohibit overnight parking of oversized vehicles, we recommend the County to instead present their chosen project as a 1 to 2 year pilot program. Such program would need to be accompanied by rigorous monitoring, including the collection of data to indicate:

- The number of currently uninhabited or abandoned vehicles
- The number of uninhabited or abandoned vehicles, post-implementation
- The current turnover of visitors parking during day time hours
- The current turnover of visitors parking during day time hours, post-implementation

- Nearby sites where the displaced vehicles relocate to
- The number of individuals who receive direct outreach and/or resources, post-implementation
- The success rate of the outreach efforts.

We encourage the County to require a monitoring program as part of the proposed project. The results of the monitoring program should be used to inform a longer-term parking plan. Successful pilot project implementation would substantively resolve impacts to daytime, public access parking in an equitable and sensitive manner. This will assure the program is narrow as possible, and tailored to the problems the program intends to address.

Alternative Transportation

LCP policies require the consideration of the effect and relationship of parking areas to the overriding policy of encouraging public transit. Therefore, the County should consider other potential means to expand public transportation opportunities which may also help to address the visitor use and limited parking availability in Bolinas.

In short, Coastal Commission staff would recommend that the County require the applicant to describe how the proposed project will address the lack of public *daytime* parking, examine project alternatives that will not disproportionality burden vulnerable populations, and create a monitoring program to document project outcomes, ensuring that the project adequately increases daytime use and beach access without offsetting the issue of overnight parking of oversized vehicles to another nearby community.

If you have any questions regarding these comments, please contact me at sara.pfeifer@coastal.ca.gov or (415) 904-5255.

Sincerely,



Sara Pfeifer
North Central Coastal Planner

Cc:

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