



MOUNTAINS RECREATION & CONSERVATION AUTHORITY

Ramirez Canyon Park
5810 Ramirez Canyon Road
Malibu, California 90265
Phone (310) 589-3230 Fax (310) 589-3237

Agenda Item 11
SMMC
6/26/2017

June 8, 2017

Honorable City Council
City of Malibu
23825 Stuart Ranch Road
Malibu, California 90265

Pacific Coast Highway Parking Study (Dated May 4, 2017) City Council Meeting, June 12, 2017, Agenda Item 6A

Dear Mayor Skylar Peak and Councilmembers:

Mountains Recreation and Conservation Authority (MRCA) staff provided comments on the Pacific Coast Highway Parking Study (Study) in letters dated March 29, 2017 and April 7, 2017 (letters attached to the City Council Staff Report for the June 12, 2017 meeting), a letter dated December 16, 2016, and an email dated February 10, 2016. We continue to have grave concerns regarding the Study and object to the City moving forward with the Study in its current form. While nearly everyone agrees that maintaining safety on Pacific Coast Highway (PCH) is of paramount importance, the Study cannot be developed and finalized in a vacuum. Implementation of the Study improvements would be in violation of the Local Coastal Program (LCP) and would result in significant adverse impacts to public services/parks/recreation and land use. We also note that many of the severe parking restrictions are proposed exactly where agencies such as MRCA have existing public access or have proposed additional public access (both inland and ocean sides of PCH). It leaves one to wonder whether the Study is an attempt to compromise existing public access and future public access efforts, on behalf of selected and favored homeowners groups.

We recommend that the City Council not receive and file the report in its current form (May 4, 2017 version). We recommend that the Council direct the consultant to revise the report, taking into serious consideration and incorporating the recommendations of commenters' concerns regarding adverse impacts to public access, including those comments from MRCA, California Coastal Commission, and State Coastal Conservancy.

We appreciate the City's and Stantec's efforts to incorporate a few of our comments, including allowing continuation of existing parking west of Meadows Court, considering existing and future access points in the recommendations for shoulder widening (p. 5.2), and eliminating certain parking restrictions (p. 5.2).

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However, the vast majority of our concerns were not addressed. We ask that the City fully address and incorporate the comments in MRCA's previous letters and email. We do not provide a comprehensive list of all those comments in this letter instant (we refer you to our previous letters and email), but some of the outstanding issues that remain include the following.

Significant Loss of Public Parking Spaces, Including by Existing and Proposed Access Points. Although the number of parking spaces to be eliminated has been reduced, it has only been reduced by two percent since the previous version. Implementation of the Study recommendations would still result in the total net loss of 661 equivalent parking spaces (p. 5.23). This is unacceptable. The Study has not adequately analyzed alternatives.

Local Coastal Program Inconsistency. The Study recommendations are inconsistent with the LCP. A LCP consistency analysis was not done. See Land Use Plan policies 2.1, 2.11, 2.27, 2.31, and 7.12 and Local Implementation Plan Sections 3.14.1(C) and (D). Implementation of the proposed recommendations would directly conflict with Policy 2.1 – the project would prevent the protection and enhancement of recreational opportunities (such as hiking, equestrian activities, and coastal access), as a resource of regional, state, and national importance. If parking is eliminated near the proposed and existing access points identified in the MRCA's comments, the value of those access points would be severely compromised (see Line 54, response to MRCA comments in Appendix D, which states that this policy does not address public parking).

Meadows Court (App. C, p. 31). We appreciate that the Study has been modified to allow parking on the inland side from approximately 375 feet north of Meadows Court to 75 feet north of Meadow Court (p. 5.16; App. C, p. 31). However, this should not be dependent on improving signage (as indicated on p. 31). This area is identified as greater than 10-foot-wide or eight to 10-foot wide (Fig. 3-19) and vehicles currently park in this area. The current signage already clearly shows the prohibited area (just west of the entrance to Meadows Court). A note should be added to Page 31 (App. C) specifying that no improvements are required in order to allowing the continuation of parking in this area.

Geoffrey's Restaurant (App. C, p. 31). It has not been properly justified and it is not acceptable to enforce no parking (by installing signage in areas the Study identifies as existing parking prohibited; App. D, Line 44), just east of the eastern Geoffrey's driveway. In the response to MRCA comments in Appendix D, Line 31 states: "...the parking restrictions directly south (east) of the Geoffrey's driveway are likely not due to shoulder width or encroachment, but are reasonable for sight distance issues, and an existing hydrant." Eliminating extensive parking that could be used for beach access visitors is not properly justified. This is a critical stretch of 175 feet currently used for parking and limited parking is available to the west of the entrance.

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What distance is required for line of sight and for the hydrant buffer, and where are those specific locations? It is a disservice to the public to reference some vague old parking restriction that may or may not be valid under current conditions when the implications are severe (e.g., Line 29 states: "Although we can't determine the reasoning at the time, it's likely sight distance purposes..."). In addition, Line 30 states that: "...it appears that the fence and landscaping in this area are outside of the public ROW and does not interfere with parking on the paved shoulder..." What is the basis for this statement? See attached aerial that contradicts this statement. We continue to recommend surveying the area for encroachments, removing parking restrictions, and removing encroachments east of the eastern driveway of Geoffrey's Restaurant.

Via Escondido Drive (App. C, p. 32). The MRCA has deeded road easement rights over Via Escondido Drive to PCH, which were acquired along with MRCA's Escondido-Flood property (Assessor Parcel Numbers [APNs] 4460-003-900 and 4460-003-901). Google Earth shows that vehicles park on the inland side of PCH between the east side of the Meadows Court subdivision and Via Escondido Drive. Appendix C (p. 32) of the report shows a section of unimproved shoulder along the parcels identified as 6447 and 6453. Figure 3-20 identifies this area as "Shoulder Parking Allowed." Figure 3-19 identifies this area as "Existing unpaved shoulder could accommodate widening to 8' paved area." While there may be a need for adequate sight distance on the portion of the unimproved shoulder along parcel 6453, parking should continue to be allowed, or enhancements should be made, along the remaining section of the unimproved shoulder along parcel 6447 to provide public parking. This section of unimproved shoulder has a significant potential to accommodate parking for public access at Via Escondido Drive. It is a disservice to the public that the report would recommend parking restrictions (Line 21, response to MRCA comments, App. D) in an area where parking is currently allowed and has the potential for improvements in close proximity a public access point. Such a recommendation is the direct opposite of maximizing public access as intended by the Coastal Act and LCP. Parking should continue to be allowed in this area and/or parking enhancements recommended.

Escondido Beach (Ocean Side, Across The Old Road) (App. C, p. 29). Implementation of the proposed recommendations would essentially create a solid wall of no parking approximately 600-foot-long in front of, and eastward of a proposed beach accessway located at 27910 PCH. This is in addition to another 500 feet of no parking west of the parcel at 27910 PCH. This is unacceptable. A strong and legally defensible justification must be provided prior to including a recommendation that will undoubtedly result in a significant, adverse impact to public services/recreation and land use.

Line 38 in the response to MRCA comments (App. D) states: "It is outside the scope of this project to determine the reason for every existing parking restriction along PCH in the City... In this case, the restrictions are recommended to remain due to a narrow shoulder width and curvature of the roadway." It is a disservice to the public to rely on some old,

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vague, undefined parking restrictions, particularly when the implications are so severe. Where is the curvature in the roadway and does that influence the entire approximately 1,100-1,400-foot-long stretch? Figure 3-19 shows some of the roadway is eight to 10- feet-wide and some is less than eight feet. Could parking be retained in the areas greater than eight-feet-wide?

Also, what is the justification for the new parking restrictions in this area? We question the logic of the argument in Line 26 in response to MRCA comments (App. D). It suggests that widening existing, allowed parking areas on the land side of PCH and adding new parking a large distance (about 1,000 feet) from East Winding Way trail entrance on the land side justify the elimination of parking on the ocean side in the direct vicinity of a proposed beach accessway. We continue to recommend a reevaluation of opportunities for continued and enhanced public parking in the vicinity of 27910 PCH, such as widening the shoulder.

Latigo Shores (App. C, p. 35). A MRCA-owned public beach accessway is located at the lot identified as 26500 through 26508. Adequate parking in close proximity to the accessway should be provided to accommodate this accessway. Although we recognize that parking could be potentially be prohibited on a portion of the shoulder on the ocean side of PCH west of the Latigo Shores Drive intersection to extend the line of sight for vehicles exiting Latigo Shores Drive, public parking should be preserved along the remaining length of the ocean side shoulder to accommodate public parking near the accessway. In fact, some of this area is identified as "Shoulder Parking Allowed" on Figure 3-20. Instead of simply relying on some old, vague, undefined parking restrictions, we recommend that the Study evaluate whether parking restrictions are warranted beyond what is necessary for line of sight requirements along the ocean side shoulder west of the Latigo Shores Drive intersection. The lack of such an evaluation could result in severely adverse impacts on public access and recreation.

Lechuza Beach Access Point Across Bunnie Lane (App. C, pp. 11 and 12). The primary access point for Lechuza Beach (across Bunnie Lane) is not shown in Appendix C (pages 11 and 12). By not showing accurate locations for existing access points (and in this case, one that is proposed to be improved), this muddies the opportunities for visitors. Line 32 in the response to MRCA comments (App. D) states: "Accessways were provided from City data and show general access locations, but not exact pathways." If the Study depended on data from the City, then the City's data is inaccurate. Accessways (existing and proposed) are clearly identified on a parcel-specific basis. The accessway to Lechuza Beach at APN 4470-024-901 on Broad Beach Road across Bunnie Lane should be shown accurately on pages 11 and 12.

Inadequate Study Review Process for the Public. The electronic copy of the Study is 21 Megabytes, and is not broken up in sections. With such a large file size, it is a slow process to navigate the large electronic file. The other cumbersome alternative for a reviewer is to print 143 pages, in parts, in order to separate the printing of the color/large

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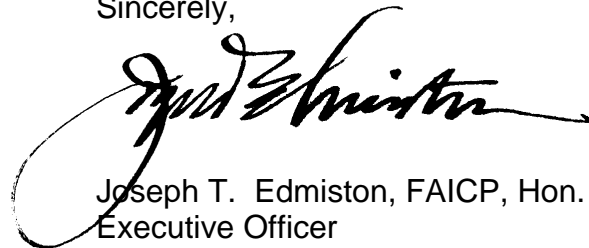
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figures. Also, an underline-strikeout (tracked changes) version of the document was not provided, making it time-consuming to do a line-by-line comparison of the old and current versions to assess any changes and incorporation of comments.

The stakes are too high for the City to move forward with the Study in its current form. It would be irresponsible for the City to receive and file this report and rely on future, piecemeal environmental analyses of recommended projects.

Thank you for your consideration of our comments. Should you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, extension 121, or via email at judi.tamasi@mrca.ca.gov, or Paul Edelman at the same phone number, extension 128, or via email at paul.edelman@mrca.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Edmiston", with a large, sweeping flourish that loops back under the name.

Joseph T. Edmiston, FAICP, Hon. ASLA
Executive Officer

Attachment: Existing Encroachments Near Geoffrey's Restaurant

cc: California Department of Transportation
Southern California Association of Governments
California Coastal Commission
State Coastal Conservancy

Existing Encroachments Near Geoffrey's Restaurant

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Property boundary limits

landscaping and fence line within Pacific Coast Highway Right-of-Way

Geoffrey's Restaurant

Escondido Beach Rd

