

#### MOUNTAINS RECREATION & CONSERVATION AUTHORITY

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> Agenda Item 11 SMMC 6/26/17

> > April 7, 2017

Elizabeth Shavelson Assistant to the City Manager City of Malibu 23825 Stuart Ranch Road Malibu, California 90265

## Pacific Coast Highway Parking Study Draft Final Report

Dear Ms. Shavelson:

On March 29, 2017, Mountains Recreation and Conservation Authority (MRCA) staff provided written comments in a letter to the City of Malibu Public Works Commission and Public Safety Commission on the Pacific Coast Highway Parking Study Draft Final Report (Study). We ask that you fully address the comments in that March 29, 2017 letter and this current letter.

One of our overarching concerns is an apparent rush to exclude public parking. The Study recommendations, if implemented, would result in a net loss of 675 equivalent parking spaces (p. 5.29). This is of particular concern near existing and proposed public access points, both ocean and inland sides of Pacific Coast Highway (PCH). Proposed public access points include existing recorded trail easements or recorded beach accessways that are not yet improved or open (several are at various stages of design and permitting), and trails as shown on the Local Coastal Program Parkland and Trails Dedication Incentive Program Map (adopted by the City Council April 11, 2016; pending a final Local Coastal Program [LCP] amendment). For example, in our December 16, 2016 letter, we provided a map of proposed beach accessways. The final Study must maintain, and where possible, enhance parking near these existing and proposed public access points.

The City of Malibu LCP Land Use Plan (LUP) Policy 2.1 states:

2.1 The shoreline, parklands, beaches and trails located within the City provide a wide range of recreational opportunities in natural settings which include hiking, equestrian activities, bicycling, camping, educational study, picnicking, and coastal access. These recreational opportunities shall be protected, and where feasible, expanded or enhanced as a resource of regional, state and national importance.

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The City of Malibu, with its world-class beaches and mountains, provides unparalleled opportunities for public access. Parking is a critical piece to ensure public access. Ensuring safety with respect to parking on PCH is clearly a fundamental goal for all stakeholders. Notwithstanding, the recommendations in the Study cannot be made in a bubble without a full consideration of the implications for public access. The final recommendations (in the text and Appendix C-Recommendations) must be modified to ensure public access is adequately protected. The final Study must also include a full analysis of consistency with the City of Malibu LCP, including but not limited to policies 2.1, 2.27, 2.31, and 7.12 and Local Implementation Plan Sections 3.14.1(C) and (D). Implementation of the recommendations as currently proposed will without question result in significant adverse impacts to public access.

#### **Overall Comments**

We reiterate three overall comments from our March 29, 2017 letter.

- It is important to identify encroachments in the public right-of-way and opportunities for enhancement of public parking, particularly in areas near existing and proposed public access points.
- Per the LCP, replacement parking spaces must be provided to offset the loss of public parking.
- 3. The Study must clarify existing conditions in order to evaluate opportunities for public parking enhancement. Specifically, in Appendix C-Recommendations, the figures must distinguish between the areas where there is existing prohibited parking versus where the shoulder is less than 8-feet-wide, as depicted by the red lines. The red lines currently lump these two conditions together as "Parking Prohibited or <8' Shoulder."</p>

Need to Expand Basis for Parking Recommendations In Order to Address Public Access (Sections 5.0 Parking Recommendations, 5.1 Background)

We recommend changes to sections 5.0 and 5.1 pertaining to parking recommendations in order to ensure that adequate parking for public use is maintained, and where feasible, enhanced. These changes should be incorporated into the final Study to ensure consistency with the LCP.

In particular, we disagree with the recommendation in the study to prohibit parking where the shoulder is less than eight-feet-wide (p. 5.4). Instead, we recommend that the final Study encompass a full range of strategies including identifying and removing encroachments in the public right-of-way; widening pavement onto existing dirt areas;

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minor smoothing/grading areas adjacent to the paved shoulder; and allowing vehicles to park partially on dirt, partially on pavement, with adequate signage directing visitors to park outside the white line.

Of note, in the strategy proposed in the Study "Improving Current Parking Restrictions," there should be a justification for parking restrictions, particularly near existing and proposed public access points. This justification must be based on existing parking standards. The final Study should identify which specific current code applies to which areas, address current and future parking and circulation needs, and address consistency Malibu LCP policies and measures, particularly near existing and proposed public access points.

To address some of our concerns, we recommend the following additional changes to the text addressing the main strategies (starting at page 5.1 of the Study; strike-out means delete; underline means add):

The main strategies are as follow:

Shoulder Widening. Where the shoulder can be widened to provide additional parking spaces, this can be recommended. Shoulder widening can be done through restriping of the existing paved area or by providing additional pavement. Criteria for recommending widening the shoulder includes wide travel lanes, wide median, or unpaved area adjacent to the shoulder which would provide additional space for widening of the paved shoulder to 8 feet or more. Another consideration is proximity to existing or future public access points. If shoulder widening can be completed through restriping, special consideration must be given to the shoulder pavement condition, including the joint between the travel lanes and the shoulder.

Shoulder Improvements. In addition to widening of shoulder pavement to provide additional parking spaces or enhance existing parking, other parking improvements can be made where the paved shoulder is currently less than eight feet. This can include one or some combination of the following: surveying and removing encroachments in the public right-of-way; allowing visitors to park with tires on the adjacent dirt and installing signs directing visitors to park outside the white line; minor smoothing/grading areas adjacent to the paved shoulder to expand the area available to park; and the option to also expand pavement. These options to improve the shoulder are a particularly valuable strategy in areas that are currently used for parking or anticipated to be used for public parking near to existing and future public access points.

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Parking Restrictions. If parking in a certain area could contribute to a safety issue, and its safety cannot be feasibly improved through shoulder widening or other shoulder improvements, the recommendation is to restrict parking. Criteria for removing parking includes shoulders less than 8 feet where parking is not currently prohibited (and cannot be improved through shoulder widening or shoulder improvements), uncontrolled pedestrian crossings, low parking demand (existing and future anticipated), or compromised sight distance at intersections and driveways. When the removal of parking on one side of the highway allows restriping of the travel lanes to widen the shoulder on the opposite site, additional spaces or improved parking can be recommended on the opposite side. Parking restrictions at bus stops that are not currently signed No Parking are also recommended to provide for safe loading and unloading of bus passengers.

Improving Current Parking Restrictions. There are areas where the current restrictions are unclear, often due to missing or damaged signs. Criteria for emphasizing current parking restrictions includes missing or deteriorated signage, deteriorated curb markings, or narrow shoulders that cannot feasibly be widened to 8 feet (or otherwise improved) or more due to physical, ROW, or financial constraints. Notwithstanding, private encroachments in the California Department of Transportation (Caltrans) right-of-way will be evaluated and considered for removal to accommodate additional or improved parking, prior to re-designating such areas as parking prohibited, particularly in areas near existing and proposed public access points. Caltrans is in the process of replacing missing signs along PCH; however, this report provides a review of conditions from 2016.

Eliminating Parking Restrictions. Existing parking restrictions should be evaluated to ensure compliance with existing codes, accommodate existing and potential future usage parking and circulation patterns, and comply with the City of Malibu Local Coastal Program policies and measures pertaining to public access. Elimination of existing parking restrictions should be considered particularly in areas near existing and future anticipated public access points. Where there would be a loss of parking spaces due to unquestionable safety requirements, eliminating parking restrictions in other areas can be used as a tool to offset the negative impacts to public access and to result in no net loss of parking spaces.

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# Critical to Ensure Adequate Parking at Existing and Future Public Access Points - Including Meadows Court, Via Escondido Drive, Geoffrey's Restaurant, and Escondido Beach

There are many areas of concern in Appendix C-Recommendations, where it appears that public parking would be severely compromised near existing or future public access points. We reemphasize from our March 29, 2017 letter that clarification is needed regarding the proposed recommendations at existing and future public access points and that adequate public parking must be maintained. In many of these areas, there is existing public parking, that may be compromised if the Study recommendations are implemented. These areas of concern include but are not limited to the following locations (page numbers refer to Appendix C-Recommendations):

- Meadows Court (Inland Side, p. 31): Existing trail easement, lower portion of trail not yet built;
- Via Escondido Drive (Inland Side, p. 32): Existing MRCA-deeded road easement rights;
- Geoffrey's Restaurant (Ocean Side, p. 31): Existing beach access; and
- Escondido Beach, 27910 PCH (Ocean Side, p. 29): Existing beach access easement, not yet improved/open.

The existing conditions and MRCA's recommendations for those locations are summarized on the attached figures.

# **Need to Identify Public Land Boundaries**

We appreciate that the figures in Appendix C-Recommendations include locations of Beach Access Points, including Public Access, County Beaches, and State Beaches. It is important for the City to have a complete picture of all public land in the study area, in order to effectively evaluate and plan for public parking needs. Specifically we recommend that MRCA-owned "Local Beaches" be added. For example, MRCA owns five parcels at Las Tunas Beach (Assessor Parcel Numbers [APNs] 4449-007-013 through 017); this should be identified on Page 63 of Appendix C-Recommendations.

The specific property boundaries of all public land within the study area should be shown, both inland and oceanside. A dot does not accurately depict the existing conditions and may not accurately reflect the actual parking need, compared with a depiction of complete public property boundaries within the study area. For example, the public property boundaries within the Study area of MRCA-owned Tuna Canyon Park, Santa Monica Mountains Conservancy-owned Corral Canyon Park, and MRCA-owned Carrillo Memorial Park should be shown (on pages 62, 38, and 5 respectively). In addition, boundaries of

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the State Coastal Conservancy-owned land at Carbon Beach should be depicted on page 54 (APNs 4451-003-900, 4451-004-900). A brown dot should be shown in this location, depicting State Beaches.

## Anticipated Beach Accessways Should Be Considered

Page 3.12 of the report states that "the City of Malibu provided information on existing and anticipated locations of beach access ways." However, the Study only identifies existing conditions and accessibility of existing public beach accessways as listed in Table 3-2 and failed to include anticipated beach accessways in this table and in the Study considerations. As recommended in our letter dated December 16, 2016, the Study should consider current and future parking demand in both areas of existing and anticipated beach accessways. Many of the anticipated beach accessways are legally recorded public access easements with improvement plans already underway. Thus, the final Study should include the anticipated beach accessways in Table 3-2 and relevant figures, and ensure that public parking will be preserved as much as possible to accommodate future parking demand for the anticipated beach accessways.

## Need to Preserve Public Parking at Latigo Shores Accessway at Latigo Shores Drive

The Study identifies the PCH shoulder on the ocean side north of Latigo Shores Drive as "Parking Prohibited or <8' Shoulder" on page 35 of Appendix C-Recommendations. Yet, the Study also identifies the same section of PCH shoulder as partially less than eight feet and eight to 10 feet in Figure 3-19 of the report. Although we recognize that a portion of the shoulder on the ocean side could potentially prohibit parking to extend the line of sight in the northbound direction for vehicles exiting Latigo Shores Drive, public parking should be preserved along the remaining length of the oceanside shoulder to accommodate public parking demand for the existing public beach accessway located at the lot identified as 26500 through 26508. The final Study should evaluate the potential to widen or enhance the shoulder, as appropriate, on the ocean side north of Latigo Shores Drive in order to preserve and maximize public parking for public beach access in this area.

# Need for Public Parking for Budwood Motorway Trail, 19453 PCH

The LCP Parkland and Trails Dedication Incentive Program Map (adopted by the City Council April 11, 2016; pending a final LCP amendment) shows the Budwood Motorway Trail traversing the lot identified as 19453 on page 63 of Appendix C-Recommendations. To adequately address parking supply and demand for anticipated future public access points, including trails, the final Study should consider widening or enhancing the shoulder on the inland side, per the recommendations of this letter, near the anticipated Budwood Motorway Trail to ensure the availability of public parking when the proposed trail is realized.

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#### Need to Widen Shoulders at Carbon Beach Between 21746 and 21660 PCH

The Study is inconsistent in depicting the highway shoulder widths. For example, a solid red line identifies a small section of PCH shoulder on the ocean side near the middle of the highway-adjacent boundary of the State Coastal Conservancy-owned property between lots 21746 and 21660 as "Parking Prohibited or <8' Shoulder" on page 54 of Appendix C-Recommendations. However, Figure 3-17 of the report identifies the entire section of the shoulder along the same State Coastal Conservancy-owned property as greater than 10 feet. Plans are currently underway to develop this site for public beach access. The Study is proposing to widen the shoulders to provide Class II bike lanes on the inland and ocean sides along this section of the PCH adjacent to the site. The final Study should consider potentially allowing public parking along the described red-lined section, and ensure that widening the shoulder to provide a bike lane would not result in a loss of existing or anticipated public parking at this key public access site.

## Need for Public Parking at Public Parkland Near Decker Road

Pages 5 and 6 of Appendix C-Recommendations show predominantly red striping, indicating "Prohibit Parking-New," in front of and west of MRCA-owned Carrillo Memorial Park (west of Decker Road), and in front of and east of National Park Service (NPS) land, just east of Decker Road. It appears that the pavement is predominantly eight to 10-feet-wide in front of Carrillo Memorial Park (Existing Shoulder Conditions, Figure 3-21). It may be less than eight-feet-wide and/or eight to 10-feet-wide in front of the NPS parkland (unclear on Figure 3-21; no parcel lines shown). The City of Malibu draft LCP Parkland and Trails Dedication Incentive Program Map (adopted by City Council April 11, 2016; pending a final LCP amendment) shows the Malibu Pacific Trail touching PCH both from the MRCA parkland and the NPS parkland.

The final Study must accommodate adequate public parking in front of MRCA parkland and NPS parkland, both west and east of Decker Road. Parking enhancements could include flattening the existing dirt adjacent to the pavement, with the option of extending the pavement. Specifically, in front of the MRCA parkland, the optimal location would start approximately 150 feet west of the eastern property line (to avoid the stream along the eastern edge of the MRCA property), and near the existing dirt path that meets PCH (labeled Nicholas Ridge Motor Way on Google Earth). Parking enhancements could be implemented for a linear distance of at least 150 feet, westward of this starting point.

# East Winding Way Public Parking Lot between 27841 and 27777 PCH

The report identifies the ownership of the public parking lot on East Winding Way adjacent to PCH as County-owned in several places such as Figure 3-7 (orange dot labeled with the number 12) and Table 3-1 (Map ID No. 12). The County has transferred fee ownership of

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the lot to MRCA. The final Study should correctly reflect the new ownership of the lot, and depict the boundaries of the lot on page 25 of Appendix C-Recommendations as publicly owned land (currently identified as lot "0" between lots 27841 and 27777).

## Two Distinct Beach Accessways at Escondido Beach, 27400 PCH and 27420 PCH

Table 3-2 and Figure 3-9 of the report includes Map ID No. 6, which identifies one beach accessway located in between 27400-27420 PCH. In fact, there is one existing accessway at 27400 PCH (as a part of Geoffrey's Restaurant) and one existing accessway at 27420 PCH. Both accessways are currently open to the public. The final Study should identify these two accessways with distinct Map ID numbers and revise the Study considerations accordingly to ensure that public parking in this area is preserved as much as possible per the recommendations in our letter dated March 29, 2017 and this current letter.

## Discrepancies in Table 3-2 and Figure 3-9

Existing and anticipated beach accessways are inadequately identified by the Study. Table 3-2 and Figure 3-9 of the report should be revised further to ensure that both existing and anticipated beach accessways are included. In regards to the existing beach accessways identified by the Study, Map ID Nos. 19 and 39 are missing from the table and the figure. Map ID Nos. 18 (20356 PCH) and 26 through 30 (a variation of County and State beaches) are not shown in Figure 3-9. The report should also verify whether Map ID No. 28 (25120.5 Malibu Road) and Map ID No. 9 (Btw. 25120-25124 Malibu Road) have the correct addresses. Furthermore, anticipated beach accessways should be identified on Table 3-2 and Figure 3-9 for a comprehensive analysis of public parking needs for both existing and anticipated public accessways.

# Carbon Beach East Driveways, Ocean Side

"Fake" driveways (i.e., that do not lead to a functioning garage) must be identified in the final Study, particularly where they are prohibiting parking in areas of current or future public parking need. Page 53 of Appendix C-Recommendations depicts several "Active Driveways", with red lines, just east of the Carbon Beach East Accessway (accessway shown as a blue dot-Public Access; east side of parcel identified as 22140). The red line is identified in the legend as "Parking Prohibited or <8' Shoulder." California Coastal Commission staff has indicated that these are not active driveways. If that is the case,

<sup>&</sup>lt;sup>1</sup>March 10, 2017 letter to Elizabeth Shavelson, Assistant to City Manager, City of Malibu. From Steve Hudson, CCC South Central District Director; Tami Grove, CCC Development & Transportation Program Manager; Linda Locklin, CCC Public Access Program Manager; Coastal Commission. Re: PCH Parking Study, Draft date 2.16.2017

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these should be shown as "Inactive Driveways" and the following actions should be identified in the final Study: eliminate curb cuts and red curbs.

Thank you for your consideration. Should you have any questions, please contact Jessica Nguyen, by phone at (310) 589-3230, ext. 125 or by email at <a href="mailto:jessica.nguyen@mrca.ca.gov.">jessica.nguyen@mrca.ca.gov.</a> I can be reached at the same phone number, ext. 128, or by email at <a href="mailto:paul.edelman@mrca.ca.gov">paul.edelman@mrca.ca.gov</a>.

Sincerely,

Paul Edelman

Chief of Natural Resources and Planning





















