

To the Coastal Commission

Re: Item #25 on the Afternoon Session of the June 28, 2016 Santa Cruz City Agenda,

HUFF (Homeless United for Friendship & Freedom) opposes the proposed ban on RV parking city-wide during the nighttime hours of midnight to 5 AM. We believe it violates the City LDC as well as being part of a broader unstated anti-homeless policy of eliminating visible poverty from public areas without respecting the rights of the entire community to have access to those areas.

It limits public access unnecessarily to the Coastal Zone.

It discriminates against poor people (and indeed anyone) who live in or drive RV's by denying them coastal access.

It puts a particular burden on those whose only affordable housing is a vehicle by making it illegal to park them at night.

It discriminates against those who **DO NOT** own or rent property in Santa Cruz by denying them a permit process.

It was done with no determination of its impact on those living in their vehicles in the City and threatens their health and safety.

It is especially cruel and abusive considering the acknowledged shelter crisis.

The Zoning Administrator's claim in his June 1st report (p.3) that parking/camping areas are available nearby ignores the inaccessibility of these areas to extremely low-income folks, just the kind of people who habitate RV's and need legal places to park during the banned hours.

The citing of 4 incidents of illegal discharge within 2 years does not justify the wholesale exclusion of all RV vehicles. The vague claims of "criminal and illegal activities" is without specific documentation. The 400 notices of illegal RV parking in a year is not understood in context with the broader number of illegal parking for vehicles generally. Nor is it clear what the nature and significance of these notices are except to cast a shadow of suspicion on those who live in RV's. Finding 3 on p. 6 of the Zoning Administrator's report is similarly vague, containing no record of citations, arrests, or convictions for the "littering, bicycle theft, private water pirating, gasoline theft, wastewater leaking, and drug activity".

Contrary to finding 4 (p. 7), the parking restricts specifically limit RV access to the beach for poor people in RV's. "Bona fide recreational access to the beach"—if you consider that applies to everyone, not just to those with money is clearly affected and restricted. Contrary to finding

#12 (p. 8) the project sacrifices free access to or along the beach and removes entirely free and accessible parking for RV's.

Nor has any study been done regarding the impact of this ordinance on those whose only housing is a vehicle in a city with shelter for less than 5% of its homeless community.

It does include **NOT** a provision for Safe Parking spaces at night, such as Santa Barbara provides, that might provide a refuge or safety valve for those banned at night.

It prejudices the right to travel, by eliminating the right to park an RV in Santa Cruz for those visiting.

It was passed without meaningful police documentation of the alleged problems justifying the unusual exclusionary policy.

It is being done without a procedure for consulting the neighborhoods involved as is the accepted practice for requiring permits to park in other cities (as well as in Santa Cruz for vehicles generally).

The oversized vehicle restriping law passed last year provides overly broad authority to the traffic engineer to expand the zone in which parking spaces for larger vehicles can be completely eliminated without recourse to public comment or public vote. This particularly impacts homeless folks who live in such vehicles, and specifically in Coastal zones where it can be expanded by traffic engineer action.

The LCP acknowledges (p. 9) that a basic goal of the Coastal Act is to “maximize access to the coast for people of **all income ranges...**” (my emphasis). Similar item #10 on p. 11 on ‘distributing public and private recreational opportunities, visitor accommodations and support facilities in a manner which ensures public access, [and] equality of coastal recreation...’

We feel this law should be sent back to the appropriate Commission or City Council committee for more public input with the individuals seriously affected (poor people who live in their vans, homeless service providers, tourists who visit the city) and to more closely consider its consistency with the City’s LCP.

We feel specific documentation on the abuses real and alleged that supposedly motivate this law rather than the anecdotal stories presented are necessary to fairly and full consider the issue. We suggest specific remedies other than total ban are appropriate. The current law is an overly broad approach that hurts poor and homeless people particularly. And shames our community generally.

Robert Norse *Homeless United for Friendship & Freedom*