



CITY OF SANTA CRUZ  
TRANSPORTATION AND PUBLIC WORKS  
COMMISSION  
AGENDA REPORT

DATE: November 3, 2014

AGENDA OF: November 17, 2014

DEPARTMENT: City Manager

SUBJECT: Programs to Reduce Illegal Dumping and RV Parking Restrictions

---

RECOMMENDATION: Provide direction to staff regarding possible programs to reduce illegal dumping of RV wastewater and to create new RV parking restrictions.

---

BACKGROUND: At its April 9, 2013 meeting, as part of a Cowell Beach Water Quality Update presentation, the City Council adopted the following motion:

Initiate regular reporting to the Santa Cruz City Council regarding ongoing County water quality testing and impacts to city beaches and watersheds; **and direct the Transportation and Public Works Commission to further review and make recommendations to reduce illegal discharges into City storm drains through educational outreach, RV parking permit programs or new disposal sites**, as well as more water quality monitoring and more effective street sweeping programs to proactively mitigate illegal discharge.

Following the April Council study session, staff confirmed a small number of cases of illegal discharge from recreational vehicles (RV) into storm drains; however, they occurred on the far Westside and did not directly affect Cowell Beach. Nonetheless, staff recognizes a need to educate residents, service providers and visitors alike about responsible stewardship of our city's resources, especially our waterways and beaches.

Simultaneously with the Council meeting and staff research of environmental impacts of RV illegal discharges, the City was engaged in efforts to create new programming and policies to address public safety issues. Council created the Public Safety Citizen Task Force (Task Force) to review City and County policies and programs and make recommendations to improve safety in the community. Among its recommendations issued to Council in its December 2013 final report, the Task Force encouraged the City to review options and implement an RV parking ordinance and increase enforcement of municipal code violations related to RV parking. Currently the City's municipal code is silent with regard to recreational vehicles.

In addition to illegal discharges, staff identified other issues related to RV parking including inhabitant criminal activities, unregulated parking in critical areas during the daytime and under-enforced regulation overnight. Santa Cruz Police Department (SCPD) staff generated a report recently, which estimated that at least 400 notices were placed on RVs and makeshift RVs from July 2013 to July 2014 for various municipal code infractions. SCPD routinely receives complaints from neighbors about

refuse accumulating around RVs, bicycles being stolen, private water connections being used, gasoline thefts, and waste water leaking onto the pavement in close proximity to parked RVs. SCPD also receives concerns about increased foot traffic to and from these vehicles consistent with drug activity.

The majority of RV parking complaints are generated on the Westside, with Natural Bridges, Shaffer Road, and the Ingalls, McPherson, Fair Avenue & Swift Street areas being the most impacted. However, environmental groups, community groups, and city residents frequently contact the City with objections of RVs using multiple parking spots along West Cliff Drive and on Pelton Avenue. The Eastside also has frequent issues on May Avenue, Emeline Street, Doyle Street, Benito Avenue, and various side streets near Seabright Beach. In addition to these impacted areas, it's important to note that the complaints occur throughout the city.

**DISCUSSION:** After analyzing the available options to address environmental, parking and safety impacts related to RVs, a two-pronged plan is recommended for your consideration:

1. Programs to Reduce Illegal Dumping

It is possible that simply educating RV drivers regarding the problems associated with illegal discharges and proper disposal will help to reduce the amount of illegal dumping. It's more likely however, that the situation could be enhanced by improving communication to RV users and creating incentives to encourage proper disposal and reporting of illegal dumping without a significant cost to the City's General Fund. Educational materials and illegal dumping mitigation programs could be funded through the Clean River, Beaches, and Ocean Special Parcel Tax (Measure E Fund).

- a. **Enhanced Water Quality Public Information.** Develop an informative flyer regarding water quality, the City's storm drain system and legal RV wastewater discharge locations. The flyer would be distributed to RV owners when contact is made by City parking enforcement (Public Works or Police) and will be made available at local non-profit service provider locations.
- b. **Voucher Program for RV Wastewater Dumping.** Develop and fund a voucher program with a partial or full subsidy of the \$15 dump fee (the nearest dumping site is the Steve's Union 76 gas station on Soquel Drive near Dominican Hospital. Note that Public Works is working to identify a dumping site within City limits, which has yielded negative results to date.) Coordinate with local non-profit service providers to distribute and track the vouchers. Continue efforts to identify and build a suitable dumping site within City limits.
- c. **Reward for Reporting Illegal Dumping.** Develop a reward program for citizens that report illegal discharges which result in a conviction. The effort may only slightly improve reporting, but it clearly demonstrates that reporting of illegal RV dumping is a priority for the City. The reward could be up to 50 percent of the fine collected resulting in no significant financial impact to the City.

2. RV Parking Regulations to Increase Safety and Reduce Community Impacts

An overwhelming percentage of complaints regarding RVs stem from their blocking access to parking spaces along the coastal cliffs and beaches, camping in vehicles overnight, illegal activities, and public health concerns. The ability of the City to address these issues through new regulations is limited by the cost to implement and manage new programs, concerns with installing a copious amount of new signage, and creating regulations that could be acceptable to the Coastal Commission.

The City must also carefully design any new regulations, so that they target illegal behaviors only. Additionally, the regulations must not be arbitrary or vague. The following economical options listed below have been utilized by other cities, but each of them carry a specific set of concerns, and will be subject to Coastal Commission review if implemented in a coastal zone.

Due to resource constraints in City departments, enforcement of any new regulations is a concern. Public Works' Parking Service will continue to enforce during normal business hours, with SCPD enforcing after 8:00 PM. Added regulations created in areas currently monitored by Parking Services will not require additional resources for increased enforcement; however, areas without meters or monitored permit areas will be addressed on a complaint-basis only. Enforcement after 8:00 PM is overseen by the Police Department. To take a proactive approach, the Police Department would need to reassign existing resources or add new resources.

- a. **Parking Changes to Limit Vehicles to Single-Space Parking.** Current parking citations are issued only when a vehicle's *tires* exceed a marked parking spot, irrespective of additional length of the vehicle that may protrude into other spaces. A change to require the entire vehicle to fit in a single-space would ensure a greater number of parking spaces available, especially along stretches of West Cliff Drive where oversized vehicles routinely occupy multiple spaces for long periods of time, thereby limiting others from using the spaces and blocking coastal views. Further, the City could create additional marked spots in targeted areas, such as on Pelton Avenue, to avoid spillover parking.

This option would require signage on every City block (both sides) where it's in effect, since signage notice is required before a citation could be issued. These signs would be similar to the parking permit notification signs and could be installed in targeted areas. It would also require that parking spaces be painted and increased funding would be needed to enforce the single-space parking regulation overnight and in non-monitored areas during the day. This option would not impact smaller RVs but could be implemented in locations prone to complaints of blocking coastal views, occupation of multiple parking spots, and traffic safety concerns.

- b. **Increased Enforcement of Existing Parking Rules.** Areas of the City that are the subject of complaints for overnight RV parking are currently signed as "no overnight parking" and applies to all vehicles. At night, SCPD is responsible for citing such vehicles. However, issued citations are frequently ignored, and truly become effective after parking boots are applied for multiple ignored infractions. Increased enforcement will rise the number of citations issued, but may not necessarily increase compliance.

- c. **RV Permit Program.** Many communities have instituted oversized vehicle permit programs; however, there is no best-practices model that has been approved by the Coastal Commission for coastal communities. Most permit programs regulate overnight parking and allow unregulated daytime parking and an exception for loading/unloading activities, while requiring an oversized vehicle to park near its registered address.

*Permit program benefits:*

- i. **Limited Signage Needed to Enforce:** Signage at the City's entrances and warning notices (with educational materials regarding permit registration and proper wastewater dumping) would be sufficient prior to a citation being issued.
- ii. **Removes loophole in 72-hour parking restriction.** Current vehicle code regulations require movement of vehicles at least 500 feet each 72 hours. Once a notice is placed on a car, it can be moved to a new location for an additional 72-hours before receiving another notice and thus leads to parking enforcement staff chasing the same vehicles around the City. This loophole is eliminated with a permit with a three consecutive day limitation.
- iii. **RV Definition.** It is possible to create a definition that will include any sized RV, camp trailer, camper, trailer coach, house car, bus, or any towed recreational vehicle.
- iv. **Enforceable Citywide.** A non-permit approach is applicable in targeted areas only and may lead to spill over into neighborhoods not currently experiencing problems.

*Permit program concerns:*

- i. **Significant Staff Impact.** Implementation, management, and enforcement of a permit program will entail a significant level of on-going administration and tracking.
- ii. **Visitors Must Register.** Most communities with a permit program require visitors to register with the Police Department and visitors may have privacy concerns.
- iii. **Local Address Requirements.** Most permit programs require that an oversized vehicle park near its registered address and allow a limited amount of guest/visitor permits per local address. This would greatly impact visitors without family or friends in Santa Cruz and will not support the City's desire to encourage tourism.
- iv. **May Appear To Target Populations.** Most communities with a permit program were asked to consider an exception for homeless oversized vehicle parking. No jurisdiction has included such an exception for two main reasons: 1) this would present an inequity in the regulation by applying the code to certain population segments based on their socioeconomic status, and 2) determining the housing status of a parked/stored vehicle's owner prior to citation is not feasible.

- v. **Permit Programs Are Not Self-supporting.** Permits are typically free of charge or provided for a minimal amount of less than \$5. Citations are a base fee and increase with each subsequent citation. Citations are typically ignored but vehicles are subject to towing after a number of citations. With a no cost or low cost permit and limited citations being paid, permit programs are not self-supporting.
- vi. **Difficult To Enforce.** Police report that overnight parking citations are typically ignored. It is expected that citations for lack of permit will also be ignored. The towing of oversized vehicles is difficult due to a shortage of local towing businesses capable of towing oversized vehicles. It may take weeks to organize a tow for a RV and should not be considered an effective enforcement technique.

Staff has attached two sample ordinances for your consideration. The permit parking ordinance is a duplication of a recently implemented City of San Diego ordinance. This ordinance was approved in August 2013 and was not implemented for over a year to allow for Coastal Commission review. The Coastal Commission declined to review the matter thus this ordinance may be acceptable to implement in Santa Cruz. The second sample ordinance would allow the City to implement the regulation for a vehicle to fit entirely within a marked parking spot.

**FISCAL IMPACT:** The programs to reduce illegal dumping of RV wastewater will be funded by Measure E funds without significant impact to the City's General Fund. In terms of ease of implementation and management, the most cost effective program for increased RV parking regulations is the single-space limitation. However, the single-space limitation will not eliminate all the problems associated with unregulated RV parking but it is a tool that could be implemented in targeted areas. An RV permit program is a citywide approach that would have a wider impact but would cost more than \$20,000 to implement and would create a new on-going program to manage and enforce.

Prepared by: Malissa Kaping, Special Projects Analyst

Submitted by:  
Scott Collins, Assistant to the City Manager

Attachments:  
Permit Parking Ordinance  
Ordinance Change for Parking Spaces