



February 15, 2019

California Coastal Commission

Re: Environmental Justice Policy Draft of January 2019
Comments from the Harbor & Beach Community Alliance, Oxnard

The Commission's Environmental Justice Policy draft recognizes that social and physical barriers can disconnect underserved lower income communities from access to coastal areas. But there are other more subtle informal barriers that discourage public access that are not expressly included in this draft.

These de facto barriers are most common in areas where private residential dwellings border public coastal and waterfront areas. These types of barriers informally privatize areas that are public by making the area appear unwelcoming and for use by only an entitled few.

This off-putting atmosphere can be created in many insidious ways. Establishing predominantly high-end stores and restaurants that cater to certain demographics and income levels can be a barrier to the underserved and lower income groups coming to coastal areas. Converting low-cost visitor-serving facilities to high-cost facilities or high-end residences also results in inequality to coastal access. Putting up walls, fences, gates, hedges, or simply placing personal items such as lounge chairs, furniture, planters, decks, locked bicycles and other recreational equipment on public walkways and areas inhibit public access.

These informal barriers can also be incorporated into the design of developments: fortress-like walled-in housing, remote or valet public parking, lack of parking without adequate public transportation, limited public amenities, inadequate or difficult to locate facilities to accommodate the elderly and disabled, and few affordable recreational activities and services.

We see these informal barriers at beaches, harbors, and commercial waterfronts, particularly wherever public waterfront and public beach walkways run along high-density, high-end residential areas. Keeping these public walkways, waterfronts and parks welcoming to all is a challenge. We have learned that people who do not experience coastal and waterfront areas will not participate or work to protect them. They need to understand their benefits and value now and for generations to come. They will only truly understand and value what they experience.

How will the Coastal Commission implement an effective environmental justice policy without taking into account these informal barriers? How will these informal barriers be considered when reviewing and approving development plans? How will the Commission monitor, manage and enforce its environmental justice policy when informal barriers are randomly put up by people who usually live or operate a business nearby?

Suggested Plans of Action:

- 1) The Commission should clearly include informal barriers in its policy because these barriers convey the message “you are not welcome here”.
- 2) The Commission needs to describe how it will consider and manage these types of subtle informal barriers.
- 3) The Commission should continue its efforts to revive the successful 1970’s program that required substantial mixed-income housing in all new coastal development. The Commission should seek legislation to restore Coastal Act policies protecting affordable housing.
- 4) The Commission should strongly recommend that local governments keep their local coastal plans reasonably updated and incorporate environmental justice issues in their plans.
- 5) The Commission should develop a list of best practices for local governments to implement its environmental justice policy.
- 6) As noted in the policy draft, the Commission should consider if legislation is needed to provide an appeal process based upon its Environmental Justice Policy.

We support and commend the Commission’s efforts on environmental justice.

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