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VIA E-MAIL

The Honorable Board of Supervisors
County of Los Angeles
Kenneth Hahn Hall of Administration, Room 383
500 West Temple Street
Los Angeles, California 90012

Re: Proposal for Housing the Homeless in Marina del Rey

Dear Honorable Supervisors:

We represent the Marina del Rey Lessees Association (“Association”). On August 10, 2021, the City of Los Angeles Administrative Officer issued a report proposing to relocate unhoused populations in Council District 11 to tiny homes or safe sleep sites to be developed on Lot 2 at 13477 Fiji Way, a County of Los Angeles owned parking lot adjacent to the public boat launch ramp in Marina del Rey (“Lot 2”). The Association strongly opposes this proposal. We request that the County provide notice to us of all future public hearings and proceedings regarding this proposed project.

Instead of finding a means to assist its unhoused population within its boundaries, the City of Los Angeles is seeking to move its unhoused population out of the City to a location in Marina del Rey, based on the false premise that Lot 2 is an underutilized parking lot.

Lot 2 is not underutilized. Lot 2 not only provides essential support for recreational boating, but also serves as an essential safety and rescue operation site. Both uses are essential to Marina del Rey’s coastal recreational purpose. Housing, whether for homeless populations or otherwise, conflicts with these uses and is inconsistent with the County’s local coastal program for Marina del Rey.

Lot 2 currently provides temporary boat storage and day use parking and staging for a public boat ramp that provides boating access. These uses require a large area to not only support storage, but to also allow for free movement for staging of vehicles and boats that use the ramp.

The public boat ramp is a priority use under the California Coastal Act. The County’s certified Marina del Rey Land Use Plan (LUP) states that Marina del Rey was “originally planned as a small craft harbor” for recreational boating. The Policies and Actions of LUP

Chapter 3 highlight recreational boating as a priority use in Marina del Rey. The LUP states that the primary purpose of the Marina “remains provision of recreational boating opportunities to satisfy local needs”. To this end, the LUP states that recreational boating is a top priority.

The public boat launch ramp is part of the recreational boating priority use. The LUP states “Recreational boating shall be emphasized as a priority use throughout the planning and operation of the Marina. To help achieve this goal, the Plan shall strive to ensure that adequate support facilities and services are provided including, but not limited to...boat dry storage yards [and] launch ramps...” The policy states, “Emphasis shall be given to providing water access for the small boat owner through provision of public ramp facilities.”

The public boat launch ramp and Lot 2, which supports it, are not underutilized. They are actively used and serve an underserved recreational need. The LUP notes there were 110,288 registered boats in 2008 within Los Angeles County. The LUP notes that Marina del Rey can only provide up to 4,338 wet-slips and 1,114 dry storage spaces, which is far less than the potential demand for recreational boating access. The public boat launch ramp and Lot 2 provide needed access for thousands of recreational boaters who are otherwise foreclosed from recreating in Marina del Rey.

Lot 2 is also one of only a few locations in Los Angeles County designated as a major air disaster evacuation site. Lot 2 is the primary emergency evacuation site in the event of a major air disaster given its proximity to LAX’s primary airliner takeoff pattern over the Pacific Ocean and the Marina’s abundance of first responder personnel and equipment, including the Coast Guard, LA County Fire, Sheriff and Lifeguard stations, which are all located in the Marina, and a hospital located on the Marina’s perimeter. Lot 2 is also a helicopter landing zone for rescue operations staged by County fire and law enforcement. Even without the Air/Sea Disaster Plan in effect, Lot 2 and the public boat launch ramp have been used for marine rescue operations by the County.

The recreational and emergency uses coexist on Lot 2 because Lot 2 is large and open enough to support both a safe landing zone and for assembling and staging emergency vehicles and response. The boat storage and launch ramp use are largely transitory and mobile so that sufficient area on Lot 2 can be created and maintained when an emergency circumstance requires it.

Housing, whether for the unhoused or otherwise, conflicts with the essential uses Lot 2 currently supports. Housing would consume a site that needs to be kept open for boat launch ramp and emergency uses and would create a resident population that would conflict with those uses. Locating housing in such close proximity to the operation of heavy equipment and disaster evacuation activities, as well as marine rescue operations, is wholly inappropriate and dangerous for public safety and security reasons, which would be exacerbated in the event of housing being located on the property.

Marina del Rey does not currently support an unhoused population. It does not have the infrastructure and services to support the needs of an unhoused community. Moving an unhoused population to Lot 2 would require infrastructure and services that will inevitably conflict with the priority uses on Lot 2 and elsewhere within Marina del Rey.

Approving housing for any purpose on Lot 2 would be incompatible with the LCP. The construction of housing is not a priority use in the Coastal Zone. As noted in LUP Chapter 8, “All development of coastal housing shall be contingent upon meeting all applicable policies and development standards of the certified LCP, including but not limited to adequate parking, view corridors, public access to the shoreline, provision of new usable public recreation and open space and visitor serving recreational uses in the plan segment, provision of adequate traffic capacity, and any provisions for low- and moderate-income and senior citizen housing subsequently certified by the California Coastal Commission.”

Locating any housing on Lot 2 would conflict with the policies the Coastal Commission has already certified in the LCP. First, any development on Lot 2 that diminishes the utility of public boat launch facilities violates policies that require the existing facilities to be maintained. The LUP Chapter 3 Policies and Actions section entitled “Boating-Related Support Facilities” states, “At a minimum, the existing boating-related support facilities and services shall be maintained for the boating public.” The LUP is quite explicit in noting that, along with other facilities, the County’s launch ramp, mast-up storage and support parking at Lot 2 are boating-related support facilities that must be maintained for the services provided to the boating public.

Second, Lot 2 is not designated as a low-income housing site in the Coastal Commission certified LCP. Lot 2 is located on Parcel 49R, which is not designated for affordable housing. The LUP supports the development of low- and moderate-income housing and housing for senior citizens, where specific parcels are identified with the categories that include residential as the principal permitted use, which does not include Parcel 49R. Residential housing is not a permitted use within any of the land use categories of the LUP that apply to Parcel 49R.

In addition to Parcel 49R, Parcel 49 includes two other sections - Parcel 49S, adjacent to Fiji Way, and Parcel 49M, adjacent to Mindanao Way. The LUP does not designate any of these parcels for affordable housing. As a result, the proposed development on these parcels would violate the LCP as well.


Third, the development would violate the standards in the Marina del Rey Specific Plan, which does not designate Lot 2 for any residential development. In particular, Lot 2 is located within the Waterfront Overlay Zone (WOZ). Under the WOZ, new development may not displace existing public recreation, visitor serving or coastal dependent boating uses, unless the use is relocated within the development zone in a comparable manner.

Any development of tiny homes or safe sleep sites on Lot 2 would require a coastal development permit, which would require a finding that the project is consistent with the policies and provision of the LCP, which cannot be made.

This project cannot be approved with an emergency coastal permit. Public Resources Code §30611 limits emergency permits to circumstances when “immediate action by a person or public agency performing a public service is required to protect life and public property from imminent danger, or to restore, repair, or maintain public works, utilities, or services destroyed, damaged, or interrupted by natural disaster, serious accident, or in other cases of emergency.” There is no natural disaster, serious accident or comparable emergency that would allow for the County to approve residential development on Lot 2. In no event can an emergency permit be issued for development that is not consistent with the LCP or the Coastal Act.

For all of these reasons, the proposal to relocate the City’s unhoused population to Lot 2 should no longer be considered a viable option and should not be approved for a coastal development permit.

Very truly yours,



Stanley W. Lamport

SWL:rsf

cc: Jack Ainsworth, Executive Director, California Coastal Commission
Gary Jones, Director, Department of Beaches and Harbors
Amy Bodek, Director, Department of Regional Planning
Small Craft Harbor Commission
Matthew W. Szabo, City Administrative Officer, City of Los Angeles