



PACIFIC PALISADES COMMUNITY COUNCIL

July 6, 2021

Hon. Wade Crowfoot, Secretary, California Natural Resources Agency

Via email: wade.crowfoot@resources.ca.gov

Armando Quintero, Director, California Dept. of Parks and Recreation

Via email: armando.quintero@parks.ca.gov

Re: Use of Will Rogers State Beach (WRSB) Parking Lot by the City of Los Angeles for Homeless Housing

Dear Secretary Crowfoot and Director Quintero:

Introduction & Background

Since 1973, Pacific Palisades Community Council (PPCC) has been the most broad-based community organization and voice of Pacific Palisades – a coastal and hillside residential community within the City of Los Angeles (City), situated in the wildland-urban interface with the Santa Monica Mountains.

WRSB is a State beach located in Pacific Palisades and owned by the State since 1942 for recreational use by all Californians. For many decades, our community has been privileged to welcome countless visitors from all walks of life who regularly use the WRSB parking lot in order to access the beach and ocean (public trust land) for recreation and enjoyment.

The County of Los Angeles operates WRSB and has done so since 1975. The City has been a lessee of WRSB since 1948, but became a holdover or “month-to-month” tenant in 1999, when the original 50-year lease term expired. Today, the City remains a holdover tenant with limited involvement or obligations; the State remains the owner of WRSB and is the City’s landlord.¹

The City Council has now directed the City Administrative Officer (CAO) to evaluate the parking lots at WRSB and another State beach, Dockweiler Beach (Dockweiler), as possible sites for “temporary” homeless housing (the Feasibility Study). For many compelling reasons, **PPCC maintains that the WRSB parking lot is entirely infeasible and strongly opposes its use for homeless housing of any kind.**²

Current Status

The Feasibility Study has been substantially completed and a final report by the CAO is expected within a few weeks. Based on our review of documents and information, we believe it is likely that the CAO has already determined that the

¹ For more information about the history and governing documents, see PPCC Letter to CAO, pp. 4-5:
<http://pacpalicc.org/wp-content/uploads/2021/06/PPCC-Letter-to-CAO.pdf>.

² PPCC also opposes the use of the Dockweiler lot for this purpose. See additional PPCC position statements/letters at:
<http://pacpalicc.org/index.php/statement-letters-re-cf-21-0350-bonin-motion/>.

use is feasible, subject to approval of the State.³ To that end, we understand that CAO staff has recently reached out to the Cal Parks Angeles District (acting) Superintendent and may also be reaching out to your offices, seeking to obtain a possible statement of approval or non-objection, which in turn may be included in the final Feasibility Study report that is expected to be submitted to City Council by the end of July.

We hope and trust that the State will decline to approve of this use, which would be unprecedented at any State beach or park in California – and is contrary to precedent established last year at another California State beach, as well as to the express mission of the Natural Resources Agency and Cal Parks – **to protect and expand access for all.**

Precedent

In early April 2020, *when the beaches were closed due to pandemic orders*, the City of Half Moon Bay (HMB) proposed to use a campground at Francis State Beach (within Half Moon Bay State Beach), for a temporary homeless shelter. The HMB Deputy City Manager has confirmed to us that after HMB’s then-State Senator Jerry Hill made inquiries to State officials (including Cal Parks and the Governor’s office), HMB officials were informed by the Cal Parks Director that **the State declined to allow this use at Francis Beach**, even at a time when the State beach was closed to public use.

To our knowledge, homeless housing has not been allowed by the State at any State beach or park in California at any time. According to the Cal Parks website, the agency’s holdings include 280 State “park units” and over 340 miles of coastline. It would be entirely inconsistent and unprecedented for the State to make this one exception and allow homeless housing now at WRSB – for 3 to 3 ½ years as the City claims is required, or for any length of time – especially when *the beach is fully open and regularly used by countless visitors from the entire region and beyond.*

Mission: Access for All

It is the express mission of all relevant California agencies – the Natural Resources Agency, Cal Parks, the State Park and Recreation Commission, the State Lands Commission, the Coastal Commission, the State Coastal Conservancy and the Mountains, Recreation and Conservation Authority – to protect and enhance public access for all to State parks, State beaches, public trust lands and/or the coast, ***as a matter of equity and environmental justice for all Californians.*** The Natural Resources Agency states on its website:

“We believe in the right of all Californians to have access to recreational opportunities, and enjoy the cultural, historic, and natural resources found across the state. While California tackles important global challenges, a critical challenge confronts us in our own communities: Too many Californians cannot access our state’s parks, beaches, and outdoor spaces. . . . While many of us get outside into nature frequently, millions of Californians never have this opportunity. Given this, **we need to expand all Californians’ access to parks, open space, nature and cultural amenities.** This priority requires reshaping our funding and programs to expand opportunities to enjoy these places. Doing so advances Governor Newsom’s strong personal commitment to building a ‘California for All.’” *[Original emphasis.]*

³ Although neither the City nor the County of Los Angeles has formally approved or taken official steps to move forward with this use to date, we have learned that for 8+ months before the proposal was made public or the Feasibility Study was directed – and before any applications for required permits had even been filed – multiple City and County agencies, elected officials and/or their staff were discussing, meeting, investigating, planning and **laying the groundwork for eventual approval**, including with Coastal Commission staff. We also understand that the City has already identified a site operator, Urban Alchemy, and has established the minimum length of time that the “temporary” shelter must remain in operation at WRSB in order to be feasible – **3 to 3½ years.**

Restricting access to a treasured California recreational resource by placing homeless housing at the WRSB parking lot would be the antithesis of this mission. Public resources such as the State beaches and parks are for **everyone to use and enjoy**, the housed and the unhoused alike, including disadvantaged or vulnerable populations who may otherwise have reduced access to recreational opportunities. Moreover, the regulations applicable to these sites should be applied to everyone equally, regardless of status, without favoring or treating one group differently from another group, whether housed or unhoused.

As succinctly put by a spokesperson for Los Angeles County Beaches & Harbors (the WRSB operator): **“We believe that everybody should be able to go to the beach and enjoy it, because beaches are public property. . . They belong to California and they belong to the residents of L.A. County.”**⁴

Alternative Sites

PPCC fully understands and appreciates that the City’s homelessness crisis has been growing for decades and was exacerbated by pandemic conditions. We agree that there is an urgent need to provide housing and services for unhoused individuals. At the same time, we strongly disagree that conditions now warrant the extraordinary use of public recreational resources such as beaches and parks for homeless housing – for 3 to 3 ½ years or any length of time. This is particularly the case when there appear to be hundreds if not thousands of alternative government-owned sites throughout the City that may be suitable for homeless housing and do not involve use of beaches or parks.⁵ The many feasible alternative sites that do not impact or limit access to public recreational resources should be the only properties to be considered for homeless housing. **State parkland like WRSB should allow unlimited access for all.**

For all of these reasons, we respectfully urge you to deny approval for the use of WRSB for homeless housing, acting on behalf of the State in your respective capacities as representatives of the Natural Resources Agency (the umbrella agency with oversight authority over Cal Parks and the other relevant agencies below) and/or of Cal Parks. Thank you for your anticipated prompt attention to and consideration of this important matter.

Executive Committee, Pacific Palisades Community Council

David Card, Chair

Christina Spitz, Secretary

David Kaplan, Vice-Chair

John Padden, Organization Representative (P.R.I.D.E.)

Richard G. Cohen, Treasurer

Joanna Spak, Elected Representative (Area 1; Castellammare, Paseo Miramar)

cc: additional relevant State officials (on p. 4, following)

⁴ Nicole Mooradian, Public Information Officer: <https://www.smdp.com/new-350ft-access-matt-installed-on-venice-beach/203853>.

⁵ Community leaders in City Council District 11 – the district where WRSB is located – have recently identified at least twenty feasible alternative sites in the district, with 200 more sites being investigated (not including beaches). Last year, Governor Newsom made available to the City multiple State-owned properties, such as vacant industrial lots, armories, and the like (beaches were not among the properties offered). City Controller Ron Galperin is currently researching an inventory of more than 17,000 properties in the City owned by six major public entities – including over 7,500 City-owned sites, but not including beaches – to be reviewed for feasibility and submitted in due course in connection with a highly-publicized pending federal lawsuit involving homelessness in the City, *Alliance for Human Rights, et al. v. City of Los Angeles, et al.*, Case No. LA CV 20-02291-DOC-(KESx).

To our knowledge, there is no court order or directive in the *Alliance* case, or from another authority, requiring any particular site in City Council District 11, including WRSB or Dockweiler, to be used for homeless housing in the City. An order requiring use of a public beach or park would in any case contradict the express goals of the presiding judge in the *Alliance* case, the Hon. David O. Carter. See letters linked in footnotes 1 and 2 above.

Pacific Palisades Community Council
Hon. Wade Crowfoot and Armando Quintero
July 6, 2021

cc (via email):

Hon. Gavin Newsom, Governor, State of California (via **Jason Elliott**, Senior Counselor for Housing & Homelessness)

Hon. Ben Allen, State Senator, SD 26

Hon. Henry Stern, State Senator, SD 27

Hon. Richard Bloom, State Assemblymember, AD 50

Jerry West, Angeles District (acting) Superintendent, Cal Parks

Rue Mapp, Chair, State Park and Recreation Commission

Jennifer Lucchesi, Executive Officer, State Lands Commission

Jack Ainsworth, Executive Director, and **Steve Hudson**, District Director, California Coastal Commission;

Sam Schuchat, Executive Director, California State Coastal Conservancy

Joseph T. Edmiston, Executive Director, Mountains, Recreation and Conservation Authority