



PACIFIC PALISADES COMMUNITY COUNCIL

April 24, 2021

Hon. David O. Carter, U.S. District Judge
Michele Martinez, Special Master
U.S. District Court, Central District of California

Via email

Re: *Alliance for Human Rights, et al. v. City of Los Angeles, et al.*; Case No. LA CV 20-02291-DOC-(KESx)

Dear Judge Carter and Special Master Martinez:

Pacific Palisades Community Council (PPCC) has been the most broad-based community organization and voice of the Palisades since 1973. Pacific Palisades is a beach and hillside community within the City of Los Angeles. Homeless individuals have for many years been drawn to Will Rogers State Beach (WRSB), located in Pacific Palisades, as well to as our nearby bluffs and canyon areas.

PPCC has been following the proceedings in the *Alliance* case with interest. We greatly appreciate the preliminary injunction ruling of April 20, 2021 (the April 20th ruling), and we agree in particular with your Honor's statements decrying the loss of public spaces such as beaches and parks as a result of appalling conditions that have forced homeless individuals into these spaces.

At the same time, Pacific Palisades is fortunate to have a dedicated group of community volunteers who make up the Pacific Palisades Task Force on Homelessness (PPTFH), an independent non-profit organization originally formed several years ago by PPCC and funded with generous community donations. Working with LAPD beach patrol officers, including Officer Rusty Redican, and with outreach workers from The People Concern, PPTFH volunteers compassionately engage *on a daily basis* with homeless individuals on and near WRSB, providing offers of housing and services and helping to reduce crime, unsanitary conditions and risks to public safety – most importantly the constant risk of fire due to dangerous homeless activities on the beach and in nearby bluffs and canyons, covered by wild coastal chapparal. Those areas, and all of Pacific Palisades, are located entirely within the LAFD-designated Very High Fire Hazard Severity Zone.

We are seriously concerned to learn that the City of Los Angeles has submitted a Sheltering Plan in the most recent Quarterly MOU Report that includes the **WRSB and Dockweiler Beach parking lots** (the Beach Parking Lots) -- owned by the State of California and operated by Los Angeles County -- among locations for homeless housing proposed by and for City Council District 11 (CD 11).¹

We are also concerned that in a motion now pending in Los Angeles City Council, CD 11 Councilmember Mike Bonin proposes that the City study the Beach Parking Lots for possible use for homeless housing.

PPCC has written letters to our elected officials, including the City Attorney, opposing these proposals and requesting that the City withdraw the Beach Parking Lots from consideration in any ongoing settlement

¹ It is unclear how the City would be authorized to contribute *non-City* owned property to a possible settlement of the *Alliance* case. We have learned that the term sheet for a possible settlement (obtained by the LA Times) indicates that the City would be required to contribute *City-owned* property. We do not know whether State or County officials have approved or would approve of this use of the State-owned/County-operated Beach Parking Lots. Moreover, the Lots are subject to the Coastal Act; Coastal Commission permission would be required but is unlikely, given the Commission's core mandate to preserve and protect public access to the beaches.

negotiations and from the Sheltering Plan for CD 11 proposed in the *Alliance* case. See *PPCC position letter*: <http://pacpalicc.org/wp-content/uploads/2021/04/Letter-re-CF-21-0350-beach-parks-homeless-housing.pdf>.² We received a response from Councilmember Bonin that did not address our concerns or requests; we have not received a response from the City Attorney.

As explained in the PPCC position letter linked above, we agree that housing and services for the homeless are urgently needed in Los Angeles. However, the proposal to use the Beach Parking Lots would have the opposite effect of what your Honor seeks to accomplish, as expressed in the April 20th ruling. These Lots are regularly used by countless citizens of Los Angeles and the wider region in order to access the public beaches. Turning the heavily-used Beach Parking Lots into homeless housing would render the public beaches -- pivotal to citizens' quality of life -- inaccessible and unavailable.

Should settlement negotiations or other proceedings in the *Alliance* case continue, notwithstanding the appeals of the April 20th ruling, we respectfully request that you both exercise your influence and/or authority, as appropriate, to **exclude the Beach Parking Lots from any final settlement or order mandating locations for homeless housing in Los Angeles.**

Thank you, your Honor and Special Master Martinez, for your consideration and attention to this important matter, and most importantly, for your dedication to finding an effective solution to the immense and growing homeless crisis in Los Angeles.

Sincerely,

David Card, Chair	David Kaplan, Vice-Chair
Richard Cohen, Treasurer	Christina Spitz, Secretary
Pacific Palisades Community Council	

cc (via email):
Sharon Browning, Co-President, PPTFH
Sharon Kilbride, Co-President, PPTFH

² See also the position taken by PPTFH at: <https://www.pptfh.org/>.