



PACIFIC PALISADES COMMUNITY COUNCIL

July 26, 2021

Matt Szabo, City Administrative Officer (CAO)

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Yolanda Chavez, Assistant CAO (overseeing the subject feasibility study)

yolanda.chavez@lacity.org

Via email and submission to City Clerk filing portal

Re: Council File 21-0350; CAO Feasibility Study – Use of Will Rogers State Beach (WRSB) Parking Lot for Homeless Housing / Factors Demonstrating Infeasibility

Dear Mr. Szabo and Ms. Chavez:

New Information – Infeasibility:

Supplementing our letters to the CAO of June 10, June 17, 2021 and July 12,¹ Pacific Palisades Community Council (PPCC) brings to your attention the fact that there is a **General Plan (GP) for WRSB**. The GP was posted a few days ago on the website of the California State Dept. of Parks and Recreation (Cal Parks) and is available at https://www.parks.ca.gov/?page_id=24366. The Cal Parks “**Purpose Statement**” for WRSB is also on the website under the “Purpose Statements Collection,” at https://www.parks.ca.gov/?page_id=21877.²

Please see our detailed GP Summary at <http://pacpalicc.org/wp-content/uploads/2021/07/WRSB-General-Plan.pdf>.

The GP and Purpose Statement make clear, beyond question, that the purpose of WRSB is for **day use for recreation and enjoyment by all members of the public** – not for habitation or housing of any kind. *(See further argument about the significance of the GP and other controlling documents and law on p. 2, following.)*

People of good will – proponents as well as opponents of the proposed use, including the undersigned and other PPCC members – encourage and applaud efforts by public officials such as the CAO and Controller Ron Galperin to ascertain feasible locations to house the unhoused in Los Angeles. It is evident now, from information that has come to light about the GP, that WRSB is **impermissible for this purpose and therefore entirely infeasible**. Spending any more time and energy on studying this disallowed site would **waste public resources and delay and impede the urgent goal** of creating housing for the unhoused. Accordingly, the CAO should terminate further study of WRSB, conclude that it is infeasible and move on to consider actually viable locations, thereby *accelerating the imperative need to house the unhoused at suitable sites*.

¹ <http://pacpalicc.org/wp-content/uploads/2021/06/PPCC-Letter-to-CAO.pdf>; <http://pacpalicc.org/wp-content/uploads/2021/06/PPCC-Supp-Letter-to-CAO.pdf>; <http://pacpalicc.org/wp-content/uploads/2021/07/PPCC-Supp-Letter-CAO2.pdf>.

² The General Plan for Dockweiler State Beach (Dockweiler) is also available at https://www.parks.ca.gov/?page_id=24356; its Purpose Statement may be found in the same Purpose Statements Collection. **The arguments made in this letter also apply to Dockweiler.** Note Cal Parks’ explanation about the Purpose Statements for the state parks (which include WRSB and Dockweiler): “*Each statement briefly identifies the most important values and features to be found in a park and indicates the Department’s primary objectives in its management.*”

Further Argument:

The GP specifically provides that “the beach should make available to **all visitors – for their benefit and enjoyment** – the wide variety of resources along the shoreline and coastal strand.” It repeatedly references the use of WRSB for **recreational opportunities**. It also mandates that management policies and construction improvements “shall be accomplished in a manner that enhances public opportunities for **ocean beach-oriented recreation**.”

It is established law that agencies’ decisions on land use and development **must be consistent with applicable general plans**. *Families Unafraid to Uphold Rural etc. v. Board of Supervisors* (1998) 62 Cal App.4th 1332, 1336. A proposed project cannot be consistent with the general plan if it violates a “fundamental, mandatory and specific land use policy.” Id. at 1341-1342.

The use now proposed for WRSB – housing for the unhoused – is fundamentally inconsistent with the GP, with the Purpose Statement, with the other documents that govern WRSB (including the Fifty-Year Operating Agreement which we have previously brought to your attention), and with all California Public Resources Code provisions applicable to state parks and beaches (e.g., PRC Sections 5001.9 (b), 5029.56 (c), 5019.53, 30210 and 30211). It is readily apparent to any reasonable person that allowing homeless housing or habitation of any kind at state parks and beaches – to remain in place for 3-3 ½ years, or for any length of time – would be completely inconsistent with the parks’ “most important values and features” as well as with Cal Parks’ express primary policy objective – *to preserve and enhance public recreational opportunities at these beaches*.³

We also note: The GP discusses and expresses concern about numerous environmental and public safety issues that were present in 1986, including significant fire and geologic hazards, flooding, traffic, and pedestrian and vehicular safety. **We specifically brought these issues to your attention** in our June 10th letter (*linked in fn. 1 above*). These same issues are present today and, in some instances, will be exacerbated by siting homeless housing at WRSB.

Conclusion:

Both WRSB and Dockweiler are entirely infeasible – under the GPs for each of these state parks, under other controlling documents and under applicable state and local laws. We respectfully urge you to immediately end further unproductive evaluation of these state parks and continue instead with the important study *of other sites that are potentially feasible to house the unhoused in Los Angeles*. Thank you.

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: City, County, State, Federal officials and other relevant entities and individuals (*listed on p. 3, following*)

³ The proposed use at WRSB would also conflict with relevant local law (Los Angeles County Code §§17.12.232(H) and 17.12.260 – dwelling prohibited on the beach and at beach parking lots, *which are one* under §17.12.030), as well as State Park Rules & Regulations (camping at any one state park campsite limited to no more than 30 days per calendar year; information on Cal Parks website).

cc (via email):

City: **Hon. Eric Garcetti**, Mayor, City of Los Angeles; **Hon. Mike Feuer**, City Attorney; **Hon. Ron Galperin**, City Controller; **Hon. Nury Martinez**, President, City Council; **Hon. Joe Buscaino**, President Pro Tempore, City Council; **Hon. Gil Cedillo**, Councilmember, CD 1; **Hon. Paul Krekorian**, Councilmember, CD 2; **Hon. Bob Blumenfield**, Councilmember, CD 3; **Hon. Nithya Raman**, Councilmember, CD 4; **Hon. Paul Koretz**, Councilmember, CD 5; **Hon. Monica Rodriguez**, Councilmember, CD 7; **Hon. Marquee Harris-Dawson**, Councilmember, CD 8; **Hon. Curren D. Price, Jr.**, Councilmember, CD 9; **Hon. Mark Ridley-Thomas**, Councilmember, CD 10; **Hon. Mike Bonin**, Councilmember, CD 11; **Hon. John Lee**, Councilmember, CD 12; **Hon. Mitch O'Farrell**, Councilmember, CD 13; **Hon. Kevin de León**, Councilmember, CD 14; **Ralph M. Terrazas**, Chief, and **Armando Hogan**, Deputy Chief & West Bureau Commander, LAFD; **Michel R. Moore**, Chief, and **Jonathan Tom**, Captain III & West Division Commanding Officer, LAPD; **Patricia J. Huber**, Asst. CAO and Executive Officer; **Ben Ceja**, Asst. CAO; **Meg Barclay**, CAO's office/Homeless Strategy; **Paula Gerez**, President, Neighborhood Council Westchester/Playa

County: **Hon. Hilda Solis**, Chair, County Board of Supervisors; **Hon. Sheila Kuehl**, County Supervisor, CSD 3; **Hon. Janice Hahn**, County Supervisor, CSD 4; **Hon. Kathryn Barger**, County Supervisor, CSD 5; **Hon. Holly J. Mitchell**, County Supervisor, CSD 2; **Daryl L. Osby**, Chief, County Fire Dept.; **Gary Jones**, Director, and **Kerry Silverstrom**, Chief Deputy Director, County Beaches & Harbors Dept.; **Cris Liban**, Chair, Beach Commission; **Clark Stevens**, Executive Officer, and **R.C. Brody**, President, Board of Directors, Resource Conservation District of the Santa Monica Mountains

Joint City/County: **Heidi Marston**, Executive Director, LAHSA; **Wendy Greuel**, Chair, LAHSA Commission

State: **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 Assemblyman, AD 50; **Jack Ainsworth**, Executive Director, and **Steve Hudson**, District Director, California Coastal Commission; **Sam Schuchat**, Executive Director, and **Megan Cooper**, Regional Manager, California State Coastal Conservancy; **Guangyu Wang**, Chief Administrative Director, Santa Monica Bay Restoration Commission; **Wade Crowfoot**, Secretary for Natural Resources, and **Angela Barranco**, Undersecretary for Natural Resources, California Natural Resources Agency; **Armando Quintero**, Director, and **Jerry West**, Angeles District (acting) Superintendent, California State Parks; **Rue Mapp**, Chair, State Park and Recreation Commission; **Jennifer Lucchesi**, Executive Officer, State Lands Commission; **Joseph T. Edmiston**, Executive Director, MRCA and Santa Monica Mountains Conservancy; **Tony Tavares**, Director, Caltrans District 7

Federal: **Hon. Diane Feinstein**, U.S. Senator (via Peter Muller, Deputy State Director); **Hon. Alex Padilla**, U.S. Representative (via Lauren Gallant, Sr. Field Representative); **Hon. Ted Lieu**, U.S. Representative, 33rd District (via Janet Turner, Field Supervisor); **Judge David O. Carter**, U.S. District Court Judge, Central District of California; **Cindy Orlando**, (Acting) Regional Director, Interior Region 8, National Park Service; **David Szymanski**, Superintendent, Santa Monica Mountains National Recreation Area; **Tom Ford**, Director, Santa Monica Bay National Estuary Program

Other: **Hon. Paul Grisanti**, Mayor, City of Malibu; **Hon. James Bozajian**, Mayor, City of Calabasas; **Hon. Denis Weber**, Mayor, City of Agoura Hills; **Carrie Carrier**, President, Topanga Town Council; **Kim Lamorie**, President, Las Virgenes Homeowners Federation; **Rachel Norton**, Executive Director, California State Parks Foundation; **Guillermo Rodriguez**, State Director, The Trust for Public Land; **Morgan Goodwin**, Sr. Chapter Director, Sierra Club/Angeles Chapter; **Shelley Luce**, President & Chief Executive Officer, Heal the Bay; **Tom Ford**, Executive Director, The Bay Foundation; **Bruce Reznik**, Executive Director, LA Waterkeeper; **Graham Hamilton**, LA Chapter Coordinator, Surfrider Foundation; **Matt Wersinger**, Chair, Westside Regional Alliance of Councils