



## PACIFIC PALISADES COMMUNITY COUNCIL

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July 19, 2021

Hon. Wade Crowfoot, Secretary, California Natural Resources Agency  
Via email: [wade.crowfoot@resources.ca.gov](mailto:wade.crowfoot@resources.ca.gov)

Armando Quintero, Director, California Dept. of Parks and Recreation  
Via email: [armando.quintero@parks.ca.gov](mailto: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:

This will further supplement Pacific Palisades Community Council's (PPCC's) letters of July 15 and July 6, 2021.<sup>1</sup>

As previously explained, PPCC opposes the proposed use of both WRSB and Dockweiler State Beach in Los Angeles (Dockweiler) for homeless housing. We have now learned that WRSB and Dockweiler each have respective **General Plans** which outline the purpose and activities allowed at these state parks and make clear that the purpose is for **public enjoyment and recreation** – *i.e.*, not for habitation, homeless or otherwise.<sup>2</sup>

According to its 1986 "General Development Plan or General Plan," as expressly set forth in the WRSB "Purpose Statement,"<sup>3</sup> WRSB's purpose is:

“. . . to provide **opportunities for the public to see, use, and enjoy for recreational purposes** the sandy beaches, intertidal rocky shorelines, and the associated terrace areas. All **beach recreational activities** which are consistent with the perpetuation of the beaches and related natural and cultural resources are appropriate for these State Beaches.

"The implementation of management policies and the location of construction improvements **shall be accomplished in a manner that enhances public opportunities for ocean beach-oriented recreation** in a high quality environment, provides a visual compatibility with the scenic quality of the units, and preserves natural and/or cultural resources present." [*Emphasis added.*]

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<sup>1</sup> <http://pacpalicc.org/wp-content/uploads/2021/07/PPCC-Supp-Letter-State-Agencies.pdf> and <http://pacpalicc.org/wp-content/uploads/2021/07/PPCC-Letter-State-Agencies1.pdf>

<sup>2</sup> The Dockweiler General Plan (1992) can be accessed on the Cal Parks website; the WRSB General Plan (1986) is listed on the website, but a digital version cannot be accessed at this time; we have requested a copy from the Cal Parks Planning Dept. and have also asked that our Senator Ben Allen's office obtain a copy.

<sup>3</sup> Both the WRSB and Dockweiler Purpose Statements can be accessed as part of the "Purpose Statements Collection," containing more than 900 statements for state park units and properties in California, available online at the Cal Parks website. As explained on the website: "*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.*"

Similarly, Dockweiler’s purpose, according to its 1992 General Plan (also set forth in its Purpose Statement) is:

“. . . to provide quality scenic, natural, and **recreational opportunities for the public**. The beach should **make available to all visitors – for their benefit and enjoyment** – the wide variety of resources along the shoreline and coastal strand. In addition, all beach activities should perpetuate both the active and passive **beach-oriented recreational opportunities** the unit has to offer as well as maintain beach resources.

“The implementation of management policies and the location of construction improvements **shall be accomplished in a manner that enhances public opportunities for ocean beach-oriented recreation** in a high quality environment that preserves existing natural resources and reinforces the aesthetic qualities of the unit.” *[Emphasis added.]*

Homeless housing at either WRSB or Dockweiler plainly would not constitute a “beach-oriented recreational opportunity,” nor would it afford the public the opportunity to “see, use and enjoy for recreational purposes the sandy beaches, intertidal rocky shorelines and associated terrace areas,” or the “shoreline and coastal strand.” It would constrict rather than enhance “public opportunities for ocean beach-oriented recreation,” and it would not preserve natural and/or cultural resources, or provide visual compatibility with or reinforce the scenic or aesthetic qualities.

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 General Plans for both WRSB and Dockweiler specifically mandate that management policies and construction improvements “*shall be accomplished in a manner that enhances public opportunities for ocean beach-oriented recreation.*” Moreover, Cal Parks affirms that each Purpose Statement “identifies the most important values and features to be found in a park and indicates the Department’s primary objectives in its management.”

The uses now proposed are *fundamentally inconsistent* with the General Plans and Purpose Statements for WRSB and Dockweiler. 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, as the City claims is required, or for any length of time – would be **entirely 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.**

We also note: Public Resources Code (PRC) Section 5001.9 (b) provides: “No new facility may be developed in any unit of the state park system unless it is compatible with the classification of the unit.” State beaches are classified as “**state recreation units**” under PRC Section 5029.56, and defined in subsection (c) of that Section as “State beaches, consisting of areas with frontage on the ocean, or bays designed to provide swimming, boating, fishing, and other **beach-oriented recreational activities.**” *[Emphasis added.]*

The use of WRSB and Dockweiler for homeless housing would clearly conflict with the recreational purpose expressed in the General Plan and Purpose Statement for each beach. The use would also conflict with applicable provisions in the governing “Fifty Year Operating Agreement,” as well as provisions of the PRC applicable to state parks, beaches and the coast (PRC Sections 5001.9 (b), 5029.56 (c), 5019.53, 30210 and 30211).

Finally, siting homeless housing at the WRSB and Dockweiler parking lots would *restrict access for all* and therefore conflict with the State’s *express commitment to expand access for all Californians to state parks and beaches*: “The state of California believes in the right of all Californians to have access to recreational opportunities. . . . Too many Californians cannot access our state’s parks, beaches and outdoor opportunities. . . . Given this, the California Natural Resources Agency is prioritizing efforts to expand all Californians’ access to park, open space, nature and cultural opportunities. . . ” (7/1/21 News Release, “California State Parks Launches New Outdoor Equity Grants Program,” <https://www.parks.ca.gov/NewsRelease/1027>).<sup>4</sup>

For all of these reasons, Pacific Palisades Community Council respectfully urges you to advise relevant officials of Los Angeles City (the holdover tenant) and County (the beach operator),<sup>5</sup> without delay, that ***the use of WRSB and Dockweiler for homeless housing is not permitted.***

Thank you for your consideration.

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 (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  
**Hon. Autumn Burke**, State Assemblymember, AD 62  
**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

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<sup>4</sup> See also the Governor’s Executive Order N-23-20 (deployment of excess state assets for temporary homeless housing) – *no state parks or beaches are included in the inventory* ([https://www.bcsd.ca.gov/hcfc/executive\\_order.html](https://www.bcsd.ca.gov/hcfc/executive_order.html)).

<sup>5</sup> City: Hon. Eric Garcetti, Mayor; Hon. Nury Martinez, President, City Council; Hon. Mike Bonin, CD 11; Matt Szabo, City Administrative Officer. County: Hon. Hilda Solis, Chair, Board of Supervisors; Hon. Janice Hahn, CSD 4; Hon. Sheila Kuehl, CSD 3.