



Los Angeles County  
Department of Regional Planning

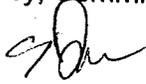
*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

October 28, 2010

TO: Wayne Rew, Chair  
Pat Modugno, Vice Chair  
Esther L. Valadez, Commissioner  
Leslie G. Bellamy, Commissioner  
Harold V. Helsley, Commissioner

FROM: Samuel Dea   
Section Head  
Special Projects Section

**SUBJECT: AGENDA ITEM NO. 6**  
**Project No. R2009-02277 - (4)**

The following attachments are comments received by staff regarding the above-referenced item:

1. A letter from a member of the public (D.G. Franklin) in opposition to the item.
2. Two emails from a member of the public (Lynne Shapiro) in opposition to the item.
3. An email from a member of the public (Cory Simon) suggesting potential traffic improvements for the Marina.
4. A letter from We are Marina del Rey in opposition to the item.
5. A letter from the Marina del Rey Boating Council in opposition to the item.

If you need further information, please call Michael Tripp of my staff at (213) 974-4813. Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

SD:MRT:mrt

Attachments

31 August 2010

Michael Tripp Regional Planning Director LA County

Having attended both meetings (Sat. 21 Aug and Tues. 24 Aug) of which you hosted along with your staff, B&H, Dept of Public Works, and the CCC. I would now like to express comments that I did not make at the Tuesday meeting. I have faith and trust in the Calif. Coastal Commission to protect and promote MDR as a Small Craft Harbor with Recreational facilities as stated in our '96 LCP.

Was it the L.A. Board of Supervisors, or under them ... the Department of Beaches and Harbors/Regional Planning or under them ... the Small Craft Harbor Commission that is our chain of command to running and maintaining MDR, that makes the decisions about the future of MDR? (Definitely not the Design Control Board that was stripped of their authority by the above) In the 26 August Argonaut Mr. Peter Phinney and Susan Cloke (DCB Chair and retired Chair respectfully) both stated that the CCC rules and regulations were being disregarded by those in charge of running and maintaining MDR to its full potential. When MDR was established recreational development was mandated; at that time it was not anticipated that a residential dictatorship would be imposed in our Marina by the lessee's. The county has not acknowledged that a lot of the changes they choose to make are not sanctioned by our LCP. We have to rely on the CCC to maintain the integrity of MDR.

The county was told by the CCC that only 3 amendments would be permitted within a year, so to get around that .... the county has bundled all but one (the proposed hotel on Mothers' Beach) of the 19 projects they wish to push through the system. The Land Use Policy as well as the Public Trust Doctrine has been overlooked, which is the foundation that supports everything in MDR. The Agencies involved are the stewards of the Public Land and cannot arbitrarily just change the land usage! The CCC has the LCP ruling that is the final decree for what happens in MDR.

Perhaps a question that came up at the Tues. evening meeting (of which there was standing room only with additional outside seats to accommodate the very interested public/residents) should be answered by those hosting the meeting. Question was WHO DECIDES WHAT PROPERTIES ARE TO BE PROPOSED AND WHERE TO PLACE THEM? Does the answer come from the Supervisors downtown, Don Knabe? From Dept. of B&H, Mr. Kriemann? Does the decision come from developers who envision their property developments on various land areas in MDR? County has been pushing their development agendas upward through the ranks, resurrecting old proposals that have gone by the wayside, and in your two recent public meetings, presenting their extremely confusing information on stand up boards at the back of the room for the public to scrutinize. Just look at what the financial greed and corruption has done to our Marina; Views of the mountains, sunsets, and open spaces have been cut off. The height of construction interferes with the air flow for sailboats (especially Esprit I) as well as the end of mole streets on the main channel. The residential side of the Marina is threatened by the projection of a 19 storey hotel with 'timeshares' on the top few floors (NOT ALLOWED ON PUBLICLY OWNED LAND).

Just where does the financial greed and corruption come from? Why do the LA County officials keep trying to change the intent of the mandate of the Harbors and Rivers Act, the Coastal Zone Management

Act and California Coastal Act? Our slips have been reduced to 4,255 from a potential of almost 7,000 original slips. We as residents, boat and business owners need to stand up to those who manage MDR (yes manage because MDR is owned by the people/residents of LA County) and demand boating focus groups, boating community meetings and require public involvement in the development process for the future of MDR!!! LA County officials have been changing the focus of our Marina from recreational boating by revising our laws for residential and commercial development. They seem to have the process backwards; B&H along with developers propose development, seek amendments (now bundled into 3 areas) and finally present their projects to the public as they pass them on to the LA County Supervisors downtown, who rubber stamp them and send them upwards to the CCC, who may or may not be aware of the process with minimal public content or approval.

The County's intent to violate Federal Law and undermine the voters in the Harbors and Rivers Act of 1954 is proven by their recent actions to change the basic intention of MDR. There are 32 acres of land in question in the 3 bundled particles/amendments that County intends to submit to the CCC with the intent to change the usage of our parking lots. The LCP states that only parking or parks are permitted on our parking lots. That's it!

*An excerpt from a letter I wrote 18 Nov. 2009 to the Argonaut follows;*

The Marina was established for the expressed purpose of providing a Small Craft Harbor as well as free and low cost public recreation that would be open to all (p. 19 of House Document 389 originally creating Marina del Rey). We need to give recreation a voice in Marina del Rey, to establish a public body to regulate the use and development of the Marina facilities that shall be open to all. This goal has been overlooked in recent years and proposed developments in the Marina have been encouraged instead.

The Los Angeles County Board of Supervisors has a very ambitious plan of hotel, office and residential development, and has not considered the possibility of recreational development in MDR. (Due to be eliminated under the County Asset Management Plan are the picnic table grilles of Mother's Beach, Mother's Beach parking lot, boaters' parking lot for the rowers organization, a significant number of small slips used by recreational sailing craft and perhaps a strip of Admiralty Way Park to allow for widening of Admiralty Way (a park widely used by bikers).

We have suggested to the California Coastal Commission, which is the ultimate arbiter of what happens in the Marina, that an organization comprised of recreational bodies make recommendations for a recreational plan in MDR. If an overall Marina Recreational Council was set up, it would encourage the development of many recreational facilities as well as organized usage of our parking lots that could be staged for multiple recreational usage. The recreation could be suspended when the parking lots are full to overflowing for the Christmas Boat Parade, 4<sup>th</sup> of July, etc.

The Marina can be an area for recreational pursuits that would include sailing, rowing, picnicking, kayaking, running, recreational walking, bicycling, physical exercising, volleyball, fishing and additional interests ... that might include a kiddies' wading pool, basketball courts, shuffle board and bowls courts, tennis courts, skateboarding, remote-control car clubs as well as a park and ride in designated areas.

If the Marina del Rey Recreational Council were to draw one representative from each of the major recreational activities; sailing, rowing, bicycling, running, athletics, kayaking and volleyball, the council member could be elected, or appointed by their various memberships, as

their bylaws permit. A committee of the elected/appointed representatives could hold meetings in the Marina monthly or bi-monthly to follow recreational developments, meet with County representatives to make suggestions and generally push the recreational agenda. All organizations or clubs should be not-for-profit with a recreational purpose and must conduct recreational activities in Marina del Rey. The Council should emphasize that promoting recreational activities increases the vitality of this unique recreational area, and makes it a much more valuable asset when working with the County. One of its first tasks would be to draw up a Recreational Master Plan for the Marina. The committee's proposals could also be submitted to the California Coastal Commission.

I ask that you share my letter with all staff who attended the two meetings, which I do thank each of you for, and of course the California Coastal Commission.

In conclusion I ask that you consider using your Regional Planning authority in a way to promote and preserve the essence of MDR by going back to the original intention of a Small Craft Harbor with public recreation that would be open to all (p. 19 of House Document 389). Recreation should be paramount in Marina del Rey and I would certainly appreciate your support for the preservation and future of our Marina. You could be our primary savior on a local level, with the use of your planning authority.

Respectfully,

D.G. Franklin

Boat owner/resident since 1983

Past President PMSA (Professional Marine Services Association)

On the first Arbitration Board (representing boaters)

On the MDR Task Force per Don Knabe (Keith Gurney project (boating representative))

P.S. Jenny Oropeza, whose Senate resolution on Coastal Development is the proper direction for our MDR community, is definitely worth wholeheartedly supporting to protect and save our Marina.

Cc MDR Argonaut

**Tripp, Michael**

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**From:** Lynne Shapiro [lro2323@gmail.com]  
**Sent:** Tuesday, October 26, 2010 7:53 AM  
**To:** Tripp, Michael  
**Subject:** LCP Amendment

To Mr. Tripp and the Regional Planning Commissioners:

I wish to go on record in opposition to the Major Amendment to the Marina del Rey LCP.

The amendment was drawn up without input from the community. There should have been a Master Plan to consider the impact of all of the proposed developments on the residential community and on recreation. There are thousands of residents in Marina del Rey west, and all of us contribute to the County coffers. Homeowners and condominium owners pay large amounts of property tax, post Prop. 13. Apartment dwellers are paying high rental prices. All of us settled here to enjoy peaceful surroundings. The developments which will be permitted by the Amendment will bring a great increase in traffic to Via Marina, our main thoroughfare, and to the mole streets adjacent to the 19 story hotel and the 526 Neptune-Legacy apartments. Neither of these projects is suitable to this community by virtue of their height, density and incongruous styles. The Woodfin will loom over the water, detrimental to boating, and over the adjacent properties, including the Silver Strand homes behind Marina Strand Colony I. The Neptune apartments are unconscionably dense. All our views of the water will be blocked. Heavy water use and hazardous waste will impact the environment.

Those of us who live here contributed to the development and profitability of the Marina when we bought property here. We continue to do so through high property tax and high rents. We do not deserve a 19 story hotel/time share, constant in and out traffic and noise, a heliport and service vehicles, and an additional 700-1000 cars at Neptune Legacy. This is a residential and recreational community and should not be plundered for profit by our County Commissioners and Supervisors. The projects that this Amendment will permit are over the top and will deter access to Marina recreation by boaters and bikers. In addition, the amendment permits the County to take the very parking lots that provide the access and instead of giving us some green parkland in place of parking as the LCP proposes, you give us more and more traffic to contend with.

This amendment is contrary to the spirit and purpose of the Local Coastal Plan for Marina del Rey.

Yours truly,

Lynne Shapiro  
5100 Via Dolce #312  
Marina del Rey CA 90292

**Tripp, Michael**

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**From:** Lynne Shapiro  
**Sent:** Wednesday, October 27, 2010 4:50 AM  
**To:** Tripp, Michael  
**Subject:** Regional Planning Commission

Addendum to previous e-mail stating objection to LCP Amendment:

In a previous statement I voiced objection to the development of Parcel 9 as a nineteen story hotel. After rereading the Cumulative Assessment Impact statement, I realize that the hotel project has been disingenuously removed from the "pipeline" despite its proximity to the enormous Neptune Legacy project. The traffic impact study is bogus. The new apartments on the mole streets have already increased traffic beyond these numbers. Saturday and Sunday traffic is heavy, as all of us who live here can attest. The two most objectionable projects are 33, The Waterfront, and Neptune-Legacy. "Reallocating" and massing buildings on these two sites is counter to the open air, recreational ambience of Marina del Rey and will cause huge traffic back ups along Admiralty and Via Marina.

Lynne Shapiro  
5100 Via Dolce #312  
Marina del Rey CA 90292

You replied on 10/4/2010 2:53 PM.

**Planner, Marina**

**From:** Cory Simon

**Sent:** Mon 10/4/2010 11:26 AM

**To:** Planner, Marina

**Cc:**

**Subject:** Suggestions for traffic improvement in Marina del Rey

**Attachments:**

Dear Marina Planner,

I hope you welcome these suggestions and that you will help me and the community by having them addressed at the public hearing on 11/3/10. Thank you for your anticipated help.

- 1) At South East corner of Via Marina and Admiralty Way, please post a sign saying, "No need to stop except for pedestrians."
- 2) At North East corner of Tahiti Way and Via Marina, please post a 'right turn only from right lane' sign. People going straight can do so from the middle lane. They invariably block traffic turning right when they go straight from the right lane. *It's a long light and a long and wasteful wait.*
- 3) To help relieve traffic back-up at Admiralty Way turning east onto Mindanao Way, lengthen the left turn lane going South on Admiralty Way and directly synchronize the lights at this intersection with the light on Lincoln and Mindanao Way.

Thank you.

Cory Simon  
Marina del Rey, CA

# **We ARE Marina del Rey**

P.O. Box 9096, Marina del Rey, CA 90295

October 7, 2010

Mr. Michael Tripp  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

**Re: Lack of maximum public opportunities to date in relation to the Local Coastal Program (LCP) Major Amendment - Project No. R2009-02277-(4)**

Dear Mr. Tripp,

California Coastal Act (Coastal Act) Section 30503 and California Code of Regulations Section 13515 provide that members of the public shall be provided maximum opportunities to participate in the preparation of an LCP amendment.

The Coastal Act section 30503 states:

“During the preparation, approval, certification, and amendment of any local coastal program, the public, as well as all affected governmental agencies, including special districts, **shall be provided maximum opportunities to participate.**” (emphasis added).

CCR 13515 states:

“Each local government and governing authority shall meet the requirements of Public Resources Code, Sections 30503 and 30504 by establishing procedures providing maximum opportunities for the participation of the public and all affected governmental agencies in the preparation of the LCP or LRDP.”

Since the first notice for the two community meetings and the start of 6-week Draft LCP amendment availability and comment period, there have been numerous issues and events that have denied members of the public its maximum opportunities to participate in the preparation of Los Angeles County's LCP major amendment. These issues are outlined below.

In order for the draft LCP amendment to satisfy the requirements of CCR 13515 and Coastal Act Section 30503, we expect the Department of Regional Planning to re-start the process by:

1) Providing a copy of the "established procedures" adopted by LA County in compliance with CCR section 13515; 2) reissuing the notice of community meetings/re-starting the 6-week availability notice and comment period; 3) holding at least one additional community meeting; and 4) continuing the November 3 Regional Planning Commission hearing until numbers 1 and 2 above are completed satisfactorily and holding said meeting (and subsequent meetings) in Marina del Rey at night.

## **Lack of Participation in Preparation of LCP Amendment**

As required by Coastal Act section 30503, members of the public were not provided any opportunity, let alone maximum opportunity, to participate in the preparation of the LCP amendment. The public was handed a full draft amendment and had no opportunity to participate in its initial contents. The public did not have a say in land use changes, in circulation changes, in development zone changes to name a few areas.

Therefore, members of the public were denied maximum opportunities to participate in the preparation of the LCP amendment.

## **Change in Project Description**

I have received the Department of Regional Planning's Notice of Public Hearing on Project Number R2009-02277, RADV200900014, the major amendment to the Marina del Rey Local Coastal Program.

The project description included on the above referenced notice sent by your department in September 2010 has materially changed from the description used in the notice of community meetings/start of the six-week draft LCP amendment availability and comment time period that was sent by your department in August 2010.

The "Description" used in Notice of Community Meetings and Draft LCP amendment availability from August 2010 read as follows:

"As part of the "roadmap approach" approved by the Board of Supervisors on September 1, 2009, a draft major amendment to the Marina del Rey Local Coastal Program has been prepared aggregating proposed amendments, including the "pipeline" projects, into one major map and text amendment."

The "Description" used in Notice of Public Hearing for the LCP amendment reads as follows:

"The major amendment to the Marina del Rey Local Coastal Program will re-designate the land use categories of several parcels, provide enhancements to open space, adopt policies to address sensitive biological resources, right size public parking, update to the circulation plan and combine development zones. In addition several minor changes to update the document are also proposed."

The original description was misleading, confusing and lacked the clarity and specificity used in the second notice. This confusion was raised during the community hearings. Residents we talked to thought that the County was undertaking public works projects related to roads and pipelines. This description discouraged participation and this notice was mailed to over 16,000 residents, boat owners and businesses according to your department!

Therefore, members of the public were denied maximum opportunities to participate in the preparation of the LCP amendment.

# **We ARE Marina del Rey**

P.O. Box 9096, Marina del Rey, CA 90295

## **Timing of Meetings and Lack of Sufficient Venue Seating Capacity**

As stated above, over 16,000 first notices were mailed by your department, yet there were less than 100 seats available at Burton Chase Park where the community meeting was held. At the August 24, 2010 meeting, many members of the public had to sit outside with no adequate sound system in place.

Additionally, the two meetings were held in the summer month of August, when most people are on holidays. The first meeting was held on a Saturday morning in summer.

If your department expected maximum opportunity for members of the public at these hearings, a larger room would have been utilized and the meetings would have been held in September when more residents would be available to attend. Therefore, members of the public were denied maximum opportunities to participate in the preparation of the LCP amendment.

## **Location of Regional Planning Commission hearing of November 3, 2010**

The Notice of Public Hearing states the November 3, 2010 hearing by the Regional Planning Commissioners will be held in downtown Los Angeles, over twenty miles from Marina del Rey. CCR 13515 (d) states:

Notice of the local government's or governing authority's hearings on LCP or LRDP documents shall be given general publication and shall be transmitted to all interested persons and public agencies not less than ten (10) working days before the hearing. The hearing required by Public Resources Code Section 30510(a) should be set for a time certain. Where the local government or governing authority determines that it is legal, practical, and would increase public participation, the hearing **should be held in the coastal zone** or in a place easily accessible to residents of the coastal zone. (emphasis added).

While this section does not require this hearing to be held in Marina del Rey, this section states the County should hold the meeting in Marina del Rey if it determines it to be legal, practical and would increase public participation. Since the Regional Planning Commission has held legal regulatory meetings in Marina del Rey in the recent past in which there was standing room only public participation, your department **SHOULD** hold the hearing in Marina del Rey.

The California Coastal Commission has held meetings at the Marina del Rey Hotel, which is a suitable location for all of LA County's LCP amendment hearings.

Otherwise, members of the public will be denied maximum opportunities to participate in the preparation of the LCP amendment.

## **Community Meetings Insufficient, Inconsistent and Lacked Disclosure of Key Proposed Land Use Changes**

The first community meeting held on August 21, 2010 included a limited ten minute presentation of the proposed LCP amendment. It lacked detail, it did not include the disclosure of numerous land use and policy changes relating to the five alleged "pipeline projects," and it did not disclose

other major land use and policy changes that are unrelated to the "pipeline projects" or whose scope reaches far beyond just those projects. These changes include, but are not limited to:

- 32 acres added to private leasehold rights
- 6 public parking lots are eliminated from the inventory of public facilities in Marina del Rey
- Marina inventory of public parking spaces is reduced by 787 spaces (not correlated to elimination of the 6 lots mentioned above)
- Inventory of public facilities on the public launch ramp is reduced
  - total number of public parking spaces is reduced by 108
  - 227 boater parking spaces are eliminated
- overhaul of public parking pricing policy
- overhaul of public/private shared use parking policy
- overhaul of alternate transportation network (primarily shuttle and waterbus) policies
- elimination of prior replacement policy
- elimination of policy requiring on-site provision of all required parking for privately-developed parcels and
- elimination of boater facility retention/replacement policy for many parcels

Therefore, members of the public were denied maximum opportunities to participate in the preparation of the LCP amendment.

**Bias against Members of the Public Opposed to LCP Amendment/In Favor of Proponents**  
During the community hearings held on August 21 and 24, 2010, members of the general public were cut off when their three minute speaking time ran out. And if someone continued past their three minutes, a staff member of the Department of Regional Planning attempted to reduce the three-minute time limit of the next member of the public. Unfortunately, members of the public that identified themselves as involved in the development of Marina del Rey, either as lessees/developers or as consultants and lawyers to lessees/developers, were allowed to speak past the three-minute mark.

The Department of Regional Planning staff member in charge of speaker cards and keeping time was found to be re-organizing the speaker cards and segregating opponents of the amendment and proponents of the amendment, changing the order from when a card was submitted. This allowed them to carry out the reduction of time listed in the preceding paragraph. The official timer would start 2nd and 3rd opponent's time before he/she had an opportunity to begin, either because previous speaker had not concluded their thought or audience applause prevented that speaker from being heard (i.e. opponent was punished for conditions outside his/her control).

The Department of Regional Planning allowed most LCP amendment proponents to use the bulk of their speaking time to address issues not pertinent to the amendment. Officials emphasized, and reiterated, that the amendment would not, in itself, constitute approvals for any project, as they were not the subject of the amendment but would be considered independently. Yet, proponent

## **We ARE Marina del Rey**

P.O. Box 9096, Marina del Rey, CA 90295

after proponent spent most of their time giving what amounted to sales pitches for their (or their client's) project. The Department of Regional Planning knowingly allowed them to continue off-topic, which severely reduced the amount of time available after the public comment time to address the questions and issues raised by members of the community. Total proponent speaking time at the 2nd community meeting was 33 minutes (not including overtime allowances).

Therefore, members of the public were denied maximum opportunities to participate in the preparation of the LCP amendment.

### **Conclusion**

We ARE Marina del Rey, on behalf of member of the public demand that the Department of Regional Planning to re-start the process by: 1) reissuing the notice of community meetings/re-starting the 6-week availability notice and comment period; 2) holding at least one additional community meeting; and 3) continuing the November 3 Regional Planning Commission hearing until numbers 1 and 2 above are completed satisfactorily and holding said meeting (and subsequent meetings) in Marina del Rey at night.

Sincerely,

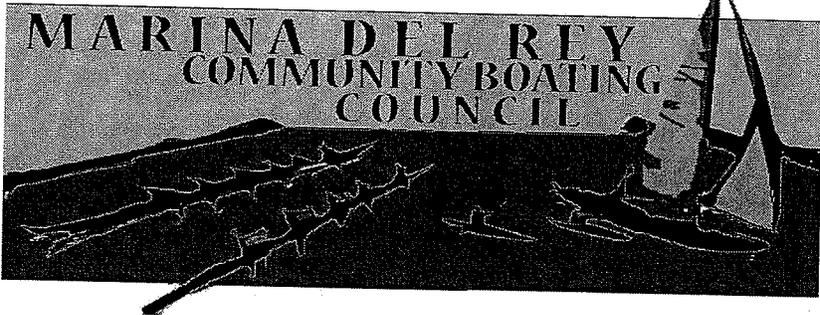


David Barish  
Co-Director

CC:

Los Angeles County Board of Supervisors  
Richard Bruckner, Director, Department of Regional Planning  
Santos Kreimann - Director, Department of Beaches and Harbors  
Lawrence L. Hafetz - Principal Deputy County Counsel  
California Coastal Commission Staff and Commissioners

MDR OUTRIGGER CANOE CLUB  
LOS ANGELES ROWING CLUB  
KAYAKS+KIDZ  
FAIRWINDS YACHT CLUB  
ROW-LA  
SANTA MONICA PADDLERS  
BOYS & GIRLS CLUB, VENICE  
UNITED MARINA ROWING ASSOC.



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## LCP Major Amendments November 3<sup>rd</sup>, 2010

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The respective member groups of the MDR Community Boating Council vigorously dispute many of the major amendments to the MDR Local Coastal Plan, especially as it relates to the developments around Mother's Beach (Marina Beach). The amendments show a lack of understanding of the use patterns of Mothers Beach, and its unique role as an access point for low cost recreational boating in Los Angeles County.

The major amendments violate the Coastal Act and threaten access for recreational boaters to Mother's Beach. Parking is a focal point for access. The parking study commissioned did not fully capture the concentrated parking demand in the recreational boating area of Mothers Beach. The proposed developments take away parking in the areas that requires the most, and shift it to areas that are unnecessary.

Based on the time lines of the projects, it is apparent that many of the decisions were already made prior to any studies showing impacts from major changes to the Land Use Plan. The Pipeline projects constitute a major redesign of Marina del Rey, and the push for these amendments prior to compliance to CEQA constitute an end run around the Coastal Act, possibly illegal based on recent court cases.

### Mothers Beach and Recreational Boating

It can't be reiterated enough that recreational boating is a primary use of Marina del Rey, per the Coastal Act. The proposed Land Use Plan acknowledges this by excerpted sections 30224, 30234, 30255 in the preface of the Recreational Boating section.

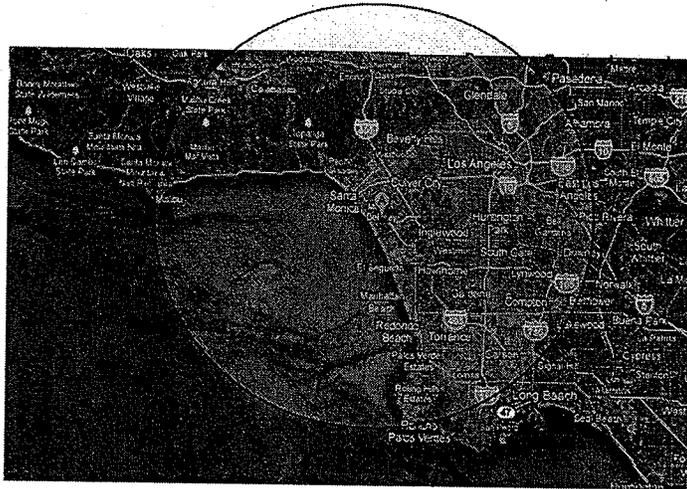
- *Uniqueness of Mother's Beach as community resource for recreational boating*

As a recreational boating resource, Mother's Beach is used by multiple community recreational boating groups, and countless individual users. Rowers, canoe paddlers, kayakers, standup paddlers, sailing groups, paddleboarders, and many others come to launch their craft.

Groups such as the MDR Outrigger Canoe Club, LA Rowing Club, Fairwinds Yacht Club, RowLA, Boys and Girls Club of Venice, Kayaks4Kids, and Boys Scouts use Mothers Beach as the primary launch point. These groups have been active participants in the Marina since its creation.

The stakeholders of Mothers Beach are a cross section of all the elements that the Local Coastal Plan seeks to encourage: **Community. Low cost. Recreational boating. Youth programs. Disadvantaged youths.**

As a calm, easy access location for small recreational boats, there is nothing similar to Mothers Beach between Ventura and San Pedro. It is a unique resource that needs to be protected.



- *Recreational Boating Study Necessary*

A needs assessments and use patterns of Mothers Beach is necessary before making major Land Use changes, especially with the change from PARKING to RESIDENTIAL.

1. Which recreational boaters and beach goers access the beach?
2. Which area of the beach is critical for recreational boating, or other uses
3. What parking lots are critical for access.
4. How do they use the beach? Where?
5. What are their needs?
6. When do they use the area?
7. How will changes effect the future use and access of the beach?
8. How will changes affect the future growth of recreational boating?

Any study done would show that the beach has distinct zones of activity, and that the north portion of the beach is CRITICAL for recreational boating. It would have shown that the parking lot NR is the ONLY lot that was proximate to this use, and irreplaceable.

A recent presentation by the Captain Mark Rizzo, (Chief, USCG, CG-542, Office of Auxiliary & Boating Safety) at the 2010 Conference of the National Association of State Boating Law Administrators (NASBLA) showed that kayaking to grow from 7.4 million to 13.5 million users, basically doubling. It is imperative that any planning to account for this growth to accommodate recreational boaters and to provide facilities, parking and access.

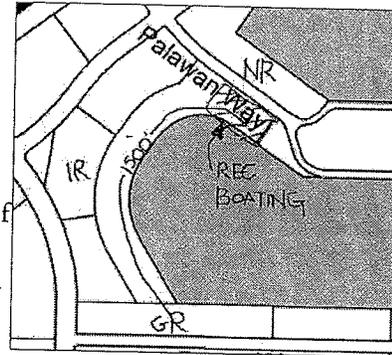
### Parking

The finding in the new Land Use Plan (page 2-10) crossing out “Marina Beach....experience high demand periods when existing parking facilities may be overcrowded”, and replacing it with “There are adequate parking facilities located throughout the Marina for the general public now and through the year 2030” is false because this general statement does not apply across the Marina.

- *Parking Study conclusions flawed- Assumptions made do not coincide with use patterns.*

Raju and Associates conducted a Right Sized Parking Study (June 2010). This parking study made a critical and flawed assumption- combining 4 lots around Mothers Beach as an “Activity Area”, and assuming that parking for all 4 lots were interchangeable. The study also fails to adequately study the parking activity of Lot NR- this is important because NR is critical to recreational boating and is slated for a change of use.

By clumping 4 lots together as the “Mother's Beach Activity Area”, the parking study masks the parking needs of the boating area (NR) by combining it with the relative under-use of lot GR (Cheesecake Factory lot). That skews the data, but more importantly, the Land Use plan uses the same assumption to shuffle around parking spaces as if they are interchangeable. All parking spaces in Mothers Beach are not equal. For purposes of recreational boating, lot GR is useless since it is 1500 feet away. Lot NR is unique and critical. Yet GR is being expanded and NR is being eliminated. What is the planning logic in that?



Based on feedback from recreational users to the draft study, Raju and Associates went back and conducted additional parking surveys. The methodology can be debated since the survey was done in a limited time period (which doesn't capture fluctuations of use), during a slow part of the season for many recreational boaters, and does not factor in future growth capacity or special event needs, but it still captured additional demand that was not shown in the original study.

- *Data shows change of use of Lot NR to be detrimental to access to recreational boating*

As flawed as the Parking Study is, it shows that the demand for parking in NR is projected to be 151 spaces in peak times, with 186 spaces currently existing. This precludes a change of zoning of the parcel since the parking lot has parking demand! If it's not broken, why fix it? The Parking Study is titled “Right Sized Parking Study”. The NR lot is the right size. Appendix B-2 and C-2 both show that the the parking demand for NR far exceeds the proposed parking provided in the new development. The proposed number of spaces proposed for the new development (69 spaces) in NR is grossly insufficient.

*\*ATTACHED: Excerpts and analysis of Raju and Associates Parking Study (dated June 2010)*

All evidence points to the necessity of maintaining NR as a parking lot. The data of the recent study support this. At a minimum it requires further and incisive analysis of use patterns before making such a critical change of use. The county has failed to provide this. The fact that the requirements for the proposed development have not changed despite the new data showing parking demand prove that the County has already made decisions of use and development prior to any study being completed.

**Recreational users of Mothers Beach require:**

1. Quantity of spots to support current and future usage/growth of recreational boating programs, both for individual users and community boating groups.
2. Proximity of spots for access and loading/unloading of equipment.
3. Affordability given heavy use of the area.
4. Clearance for high clearance vehicles, since many boats are transported on large vehicles- an open air parking lot is required.

**LCP Amendments, Developments and "Save Tara" ruling**

The proposed massive, multistory commercial/residential Waterfront complex consuming the parking lot next to Mothers Beach will have significant adverse impacts on recreational use, parking, traffic, water quality, density, sailing wind, boat access, among other things. Despite these impacts and the fact that the Waterfront is advanced in programming and schematic design, there's never been any Environmental Impact Report (EIR) done per the California Environmental Quality Act (CEQA)

Recent case law such as the California Supreme Court ruling on the *Save Tara* case is one of many cases which have determined that "decisions" made prior to a formal approval require CEQA compliance prior to such "decisions." Negotiating of leases qualify as "decisions" that necessitate CEQA. There is specific mention that such "decisions" made early build up enough bureaucratic momentum that it is difficult or infeasible to reverse later. There is also a recent case involving the City of Bell which also related to leases and CEQA. These rulings have direct application to the County's action related to development in the Marina.

The impacts of the Waterfront project has not been explored or studied even though a major change is proposed- a change of use of a critical parking lot servicing recreational boating (a primary use) to residential (non priority use). From its inception with the RFP from the County, to the negotiating of leases, the zoning use change of parking lot to residential uses has been predetermined. The RFP and the leases presupposes the change of use without any study of whether such change is necessary, and its impacts. This is a clear violation of the *Save Tara* rulings.

Without any recreational resource or environmental impact assessment, the Department of Beaches and Harbors, solicited Request for Proposals (RFP) and negotiated leases with the developer without *Save Tara* mandated CEQA compliance. The very fact that the County is advocating for these Amendments show a tacit if not official approval of the scope, scale, and change of use, all without review or CEQA. It doesn't matter that a formal approval is pending (and that the project can theoretically still be denied). The question is: "Why change the law before the change is even studied and determined to be allowable?". These changes will be encased in law after the Amendments are approved, and difficult if not impossible to reverse.

When the County Design Control Board repeatedly raised serious questions about the Waterfront project, the DBH supported law amendments completely gutting the Design Control Boards' power; removing it from project consideration. When opposition to the Project was mounting, the Waterfront project was added to the other Pipeline projects, although it had not submitted any application up to that period and was not in the approval process.

The LCP Amendment approval would mean the Waterfront project won't have to specifically go before the Coastal Commission even though it is a major change of use of a critical parking lot serving recreational boating. This circumvents the Coastal Act. This Project and its details has not been submitted to the Dept of Regional Planning and has never gone through a single compliance of environmental due process required by CEQA. All the regulatory actions (and its inclusion in this LCP amendment process) show cooperation and tacit approval by the County.

### Conclusion

The development around Mother's Beach shows a lack of planning, and analysis, and a subjugation to developer needs and interest placed before public interest. This is a conflict of interest that County faces in its position as both a lessor, and a guardian of the public welfare. So far the County has shown only to act as an expediter to Development interests and not adequately study the impact on public use.

The County, Beaches and Harbors, and Dept of Regional Planning need to study the area around Mothers Beach and do a thorough survey of recreational use prior to making a major Land Use change that would irretrievably impact recreational boating in Mother's Beach. The Land Use Plan and the LCP Amendments are inadequate and do not conform to the spirit or the law of the Coastal Plan, and the process violates recent legal rulings regarding approvals of such developments

Attached are supporting analysis and previous correspondence along with this submittal to show our trail of involvement in the process, and which show additional information related to these issues.

- Excerpts and analysis of Raju and Associates Final Parking Study (dated June 2010)
- Response to LCPA- Slide Presentation of MDRCBC to County Staff on Aug. 24, 2010

We would respectfully request a written response addressing each of the above areas.

Marina Del Rey Community Boating Council  
and its respective members.

excerpt of Raju and Associates Right Size Parking Study (June 2010)

APPENDIX A3  
 Parking Survey for The Organic Panificio (Parcel 33)  
 Saturday, September 27, 2008

Time	Arriving			Departing			Parking Demand
	Kayak	Jogger	Walking	Kayak	Jogger	Walking	
5:30 AM	0	1	0	0	0	0	8
5:45 AM	0	0	0	0	0	0	8
6:00 AM	0	0	0	0	0	0	8
6:15 AM	0	0	0	0	0	0	8
6:30 AM	0	0	0	0	0	0	8
6:45 AM	0	0	0	0	0	0	8
7:00 AM	1	0	0	2	1	0	6
7:15 AM	4	0	0	0	0	0	10
7:30 AM	7	0	0	1	0	0	16
7:45 AM	20	0	0	0	0	0	36
8:00 AM	3	1	0	0	0	0	40
8:15 AM	1	1	0	0	0	0	42
8:30 AM	0	0	0	0	0	0	42
8:45 AM	1	0	0	0	0	0	<b>43</b>

Parking Survey for L.A. County Parking Lot NR  
 Saturday, September 27, 2008

Time	Arriving			Departing			Parking Demand
	Kayak	Jogger	Walking	Kayak	Jogger	Walking	
5:30 AM	0	0	0	0	0	0	11
5:45 AM	0	0	0	0	0	0	11
6:00 AM	0	0	0	0	0	0	11
6:15 AM	0	0	1	0	0	0	12
6:30 AM	0	0	0	0	0	1	11
6:45 AM	0	0	0	0	0	0	11
7:00 AM	2	0	0	0	1	0	12
7:15 AM	0	0	0	0	0	0	12
7:30 AM	2	0	0	0	0	0	14
7:45 AM	2	0	0	0	0	0	16
8:00 AM	1	0	0	0	0	0	17
8:15 AM	0	0	1	0	0	0	18
8:30 AM	0	0	0	0	0	0	18
8:45 AM	0	0	0	0	0	0	<b>18</b>

Total Public Parking Demand = 43+18 = 61

- Raju & Assoc. went back and added this after being informed by community recreational boaters, that their original count undercounted demand by not including parking taking place on the lot for Organic Panificio
- The 2 dates (the only one listed) are also in the offseason- a short downturn of activity in between seasons, and yet it still shows a significant increase of use (228%)
- As shown above, 43 additional spaces were found to be necessary. Yet the development total has not changed at all. 69 before study and 69 after.
- Data made to fit prior decision?

excerpt of Raju and Associates Right Size Parking Study (June 2010)

APPENDIX A3  
Los Angeles County Lot GR  
Thursday, October 09, 2008

Time	Recreational		Employees		Customers		Cheesecake Factory Parking Demand	Lot GR Public Parking Demand	Total
	In	Out	In	Out	In	Out			
9:00 AM	0	0	0	0	0	0	0	11	11
9:15 AM	0	0	0	0	0	0	0	11	11
9:30 AM	1	0	0	0	0	0	0	12	12
9:45 AM	0	0	0	0	0	0	0	12	12
10:00 AM	3	1	0	0	0	0	0	14	14
10:15 AM	0	0	0	0	0	0	0	14	14
10:30 AM	1	1	1	0	0	0	0	14	14
10:45 AM	0	0	0	0	0	0	1	14	15
11:00 AM	1	2	3	0	0	0	4	14	15
11:15 AM	1	1	3	0	0	0	7	13	17
11:30 AM	0	0	1	0	3	0	11	13	20
11:45 AM	0	0	7	0	0	0	18	13	24
12:00 PM	1	1	0	0	1	0	19	13	31
12:15 PM	1	1	0	0	0	0	19	13	32
12:30 PM	0	0	0	0	0	0	19	13	32
12:45 PM	0	0	0	0	1	0	20	13	32
1:00 PM	2	0	0	0	3	0	23	15	33
1:15 PM	0	0	0	0	8	0	31	15	38
1:30 PM	1	0	0	1	0	2	28	16	44
1:45 PM	0	2	1	0	1	0	30	14	44
2:00 PM	0	1	0	0	1	0	31	13	44
2:15 PM	0	1	0	1	1	2	29	12	41
2:30 PM	0	0	1	1	2	3	28	12	40
2:45 PM	1	1	0	0	0	7	21	12	33
3:00 PM	0	1	0	0	0	0	21	11	32
3:15 PM	0	0	0	1	0	1	19	11	30
3:30 PM	0	0	0	3	1	0	17	11	28
3:45 PM	0	0	0	2	0	1	14	11	25
4:00 PM	0	1	0	3	0	0	11	10	21
4:15 PM	0	1	3	0	0	0	14	9	23
4:30 PM	0	0	5	3	0	0	16	9	25
4:45 PM	0	0	6	1	0	0	21	9	30
5:00 PM	0	0	1	0	0	0	22	9	31
5:15 PM	0	0	3	1	0	1	23	9	32
5:30 PM	0	0	10	7	0	1	25	9	34
5:45 PM	0	0	4	2	3	0	30	9	39
6:00 PM	0	0	0	0	0	0	30	9	39
6:15 PM	0	0	2	0	1	1	32	9	41
6:30 PM	0	0	0	1	2	0	33	9	42
6:45 PM	0	0	2	0	8	0	43	9	52
<b>Total</b>	13	15	53	27	36	19		9	52

LOT GR SHOWS ONLY 16 SPACES FOR PUBLIC DEMAND, WHY IS IT BEING ENLARGED?

**excerpt of Raju and Associates Right Size Parking Study (June 2010)**

**APPENDIX B-2  
EXISTING CONDITIONS PUBLIC PARKING DEMAND ANALYSIS BY DAY AND LOT**

#	Activity Area	Lot Number - Parcel	Supply Existing Number of Spaces	Public Demand & Utilization Profiles																											
				Max (Peak) Occupied Spaces on Weekdays										Max (Peak) Occupied Spaces on Weekend Days										Max Occupied Spaces on Holidays (Peak) **							
				Fri 5/27/05	Fri 7/1/05	Fri 9/2/05	Fri 5/25/07	Fri 8/31/07	Thur 10/25/07	Fri 9/04/09	Sat 5/28/05	Sun 5/29/05	Sat 7/2/05	Sun 7/3/05	Sat 9/3/05	Sun 9/4/05	Sat 5/26/07	Sun 5/27/07	Sat 9/1/07	Sun 9/2/07	Sat 11/3/07	Sun 9/5/09	Sun 9/6/09	Sat 12/8/07	Mon 5/30/05	Mon 7/4/05	Mon 9/5/05	Mon 5/28/07	Wed 7/4/07	Mon 9/3/07	Mon 9/7/09
1	Mother's Beach	8 - OT	183	7	97	59	53	5	4	57	3	31	8	15	5	39	45	43	52	18	22	38	45	17	156	46	3	89	2	0	
		9 - NR	386	34	48	55	41	56	36	38	77	69	79	82	87	81	77	79	84	108	58	99	88	22	27	187	48	44	186	45	67
		10 - IR	212	2	22	5	9	11	65	70	71	86	66	156	109	161	55	76	41	102	24	124	214	54	121	209	78	47	209	205	167
		11 - GR	262	40	36	60	32	30	30	47	15	15	13	19	19	16	19	15	21	15	12	13	15	173	127	263	146	111	263	112	122
2	Yvonne B. Burke Park***	5 - U	220	115	87	90	23	30	19	11	53	24	11	5	24	3	8	4	12	7	14	8	9	51	26	174	1	9	200	5	4
		7 - Q	120	6	6	3	15	21	11	13	9	13	9	118	16	10	15	107	18	102	91	36	31	120	7	120	9	9	120	15	35
3	Chace Park	2 - 49R	239	35	49	45	53	62	24	39	147	144	169	156	122	159	122	189	125	195	70	101	104	93	123	161	116	107	181	135	85
		4 - 49M	140	37	11	78	82	86	31	5	22	40	28	34	76	77	38	32	43	45	27	18	37	29	38	152	71	71	150	67	30
		EE	58	58	58	58	58	58	32	58	58	58	58	58	58	58	58	58	58	58	51	58	58	58	58	58	58	58	58	58	58
4	Fiji Way	Overflow Lots *	252	n/a	107	127	85	81	90	75	n/a	n/a	126	142	118	141	86	92	90	116	94	90	92	233	n/a	265	110	67	250	69	58
		Fisherman's Village (1) - W	502	n/a	18	22	28	26	11	20	n/a	n/a	28	42	41	51	51	52	52	36	36	55	63	422	n/a	439	284	340	439	238	365
		Dock 52 - 52	236	n/a	54	34	28	26	29	34	n/a	n/a	70	88	68	95	71	86	73	97	48	69	91	207	n/a	239	221	179	238	216	229
5	North Channel	13 - 3S	140	16	20	26	16	19	15	35	23	58	48	88	41	68	52	69	59	88	32	89	126	137	82	138	60	39	134	113	135

**NOTES:**

- \* Overflow Lots owned by US Dept. of Fish & Game, not by county; as such, they are not included in the computation of demand and availability of supply in the report.
- \*\* Holiday parking demands include non-public use parking demands.
- \*\*\* Formerly known as Admiralty Park

**UNDERCOUNTED - does not include parking in adjacent lots**

**excerpt of Raju and Associates Right Size Parking Study (June 2010)**

APPENDIX C-2  
FUTURE ANTICIPATED CONDITIONS PUBLIC PARKING DEMAND ANALYSIS BY DAY AND LOT

#	Activity Area	Lot Number - Parcel	Supply Proposed Number of Spaces	Anticipated Future Public Parking Demand & Utilization Profiles																			
				Occupied Spaces on Weekdays							Occupied Spaces on Weekend Days												
				Day 1	Day 2	Day 3	Day 4	Day 5	Day 6 (Typical)	Day 7	Day 8	Day 9	Day 10	Day 11	Day 12	Day 13	Day 14	Day 15	Day 16	Day 17 (Typical)	Day 18	Day 19	Day 20
1	Mother's Beach	8 - OT	92	8	110	67	60	6	5	65	3	35	9	58	17	6	44	51	49	59	20	25	43
		<del>9 - NR</del>	<del>69</del>	<del>59</del>	<del>75</del>	<del>61</del>	<del>67</del>	<del>84</del>	<del>62</del>	<del>64</del>	<del>120</del>	<del>112</del>	<del>122</del>	<del>125</del>	<del>130</del>	<del>124</del>	<del>120</del>	<del>122</del>	<del>127</del>	<del>151</del>	<del>101</del>	<del>142</del>	<del>131</del>
		10 - IR	109	2	25	6	10	12	74	79	80	97	75	177	123	182	62	86	46	115	27	140	242
		11 - GR	382	45	63	68	36	34	34	53	17	17	15	22	22	18	22	17	24	17	14	15	17
2	Yvonne B. Burke Park***	5 - U	222	130	98	102	26	34	22	12	60	27	12	6	27	3	9	5	14	8	16	9	10
		7 - Q	120	7	7	3	17	24	12	15	10	15	10	134	18	11	17	121	20	115	103	41	35
3	Chace Park	2 - 49R	234	44	62	57	67	78	30	49	185	181	212	196	153	200	153	238	157	245	88	127	131
		4 - 49M	450	47	14	98	103	108	39	6	28	50	35	43	96	97	48	40	54	57	34	23	47
		EE		58	58	58	58	58	32	58	58	58	58	58	58	58	58	58	58	51	58	58	58
4	Fiji Way	Overflow Lots*	314	n/a	121	144	96	92	102	85	n/a	n/a	143	161	134	160	97	104	102	131	106	102	104
		Fisherman's Village (1) - W	1,012**	n/a	20	25	32	29	12	23	n/a	n/a	32	48	46	58	58	59	59	63	41	62	71
		Dock 52 - 52	0	n/a	61	38	32	29	33	38	n/a	n/a	79	100	77	108	80	97	83	110	54	78	103
5	North Channel																						
		13 - 3S	138	18	23	29	18	22	17	40	26	66	54	100	46	77	59	78	67	100	36	101	143

YEARLY GROWTH	0.6
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- NOTES:
- \* Overflow Lots owned by US Dept. of Fish & Game, not by county; as such, they are not included in the computation of demand and availability of supply in the report.
  - \*\* Includes parking supply for Fisherman's Village Development. Shared Parking is contemplated at this location.
  - \*\*\* Formerly known as Admiralty Park

As flawed as the Parking Study is, it still shows that Parcel NR has a parking demand that far exceeds the proposed number of spaces in the new development. Since NR is the only proximate parking lot to the recreational boating users, it highlights the lack of planning and analysis that was done prior to the lot being designated to be rezoned from parking to residential.

excerpt of Raju and Associates Right Size Parking Study (June 2010)

(90TH PERCENTILE FUTURE DEMAND/  
MINIMUM PUBLIC PARKING REQUIREMENT/  
EXISTING PARKING SUPPLY/  
FUTURE POTENTIAL PUBLIC PARKING SUPPLY)

MOTHER'S BEACH  
ACTIVITY AREA  
( 360 / 400 / 843 / 652 )

This is a grouping which is not based on actual usage of the beach. Equating the 4 lots as equivalent demonstrates a fundamental misunderstanding of the use of the beach. The clumping of these lots is a fatal flaw to the parking study

NORTH CHANNEL  
ACTIVITY AREA  
( 100 / 110 / 140 / 138 )

YVONNE B. BURKE PARK  
ACTIVITY AREA  
( 102 / 115 / 340 / 342 )

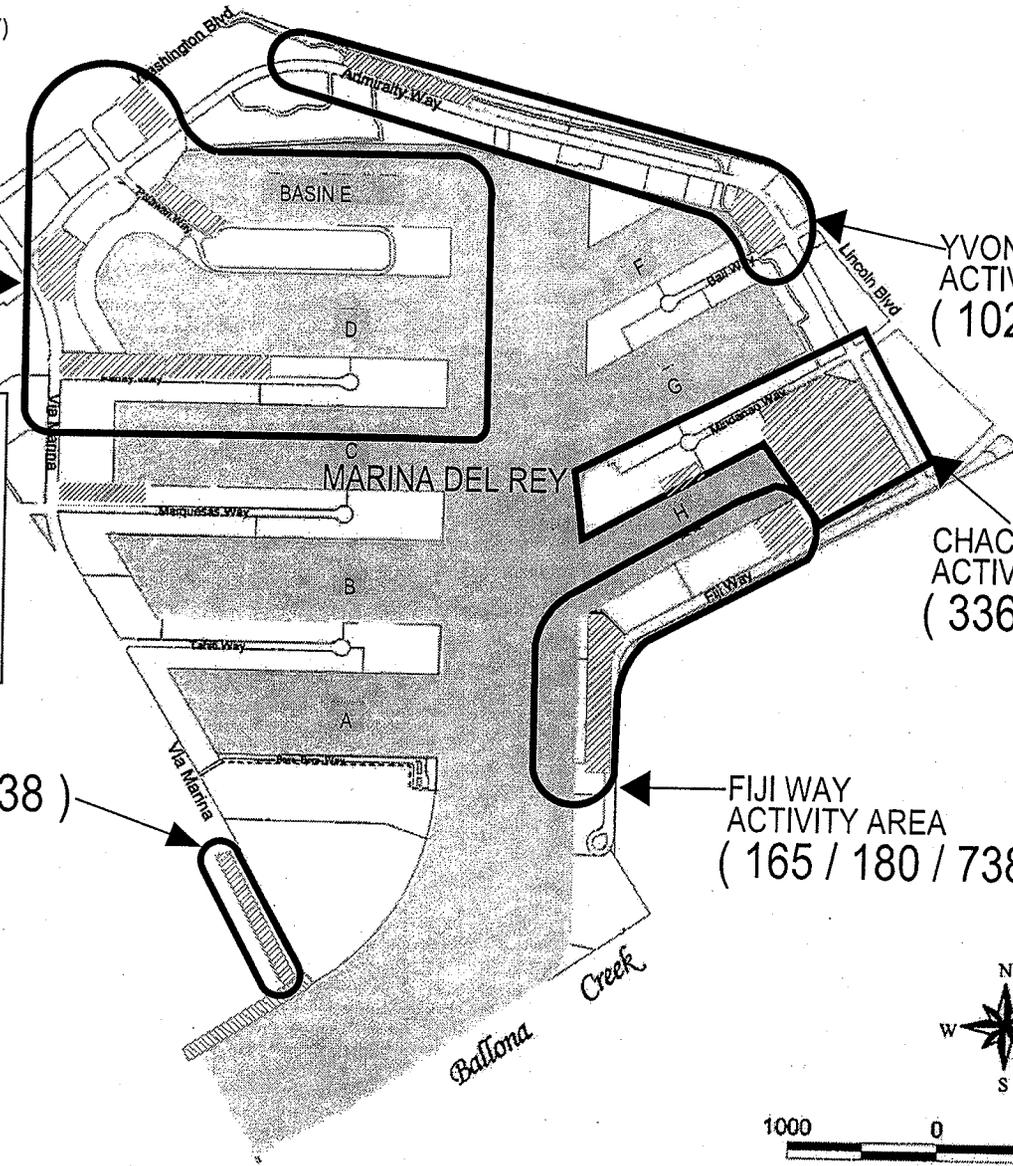
CHACE PARK  
ACTIVITY AREA  
( 336 / 370 / 437 / 684 )

FIJI WAY  
ACTIVITY AREA  
( 165 / 180 / 738\* / 1,012\* )

- LEGEND:
-  - PUBLIC PARKING LOT LOCATION
  -  - ACTIVITY AREAS
  - \* - USED BY OTHER COMMERCIAL USES ALSO

(360/400/  
843/652) - 90TH PERCENTILE FUTURE DEMAND/  
MINIMUM PUBLIC PARKING REQUIREMENT/  
EXISTING PARKING SUPPLY/  
FUTURE POTENTIAL PUBLIC PARKING SUPPLY

SOURCE: LOS ANGELES COUNTY DEPT OF BEACHES AND HARBORS, PLANNING DIVISION.



# **Marina Del Rey Community Boating Council**

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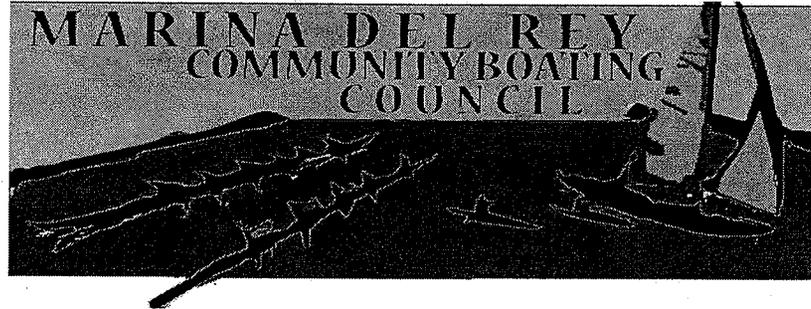
**LCP Major Amendment Community Meeting**

Dept. of Regional Planning

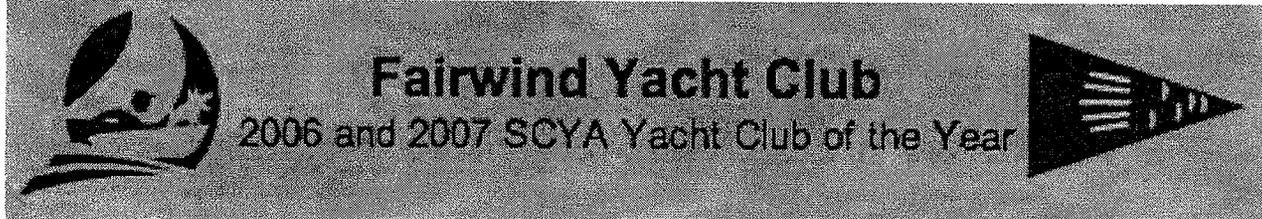
August 24, 2010

# Who We Are

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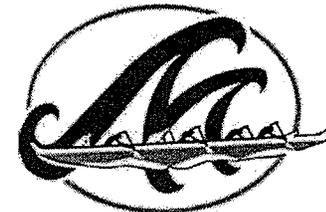


The Los Angeles Rowing Club



*Marina Del Rey*  
**OUTRIGGER CANOE CLUB**

est. 1968



**UNITED MARINA ROWING ASSOC.**



# **Marina/Mothers Beach**

**Endangered resource for Los Angeles and Environs**

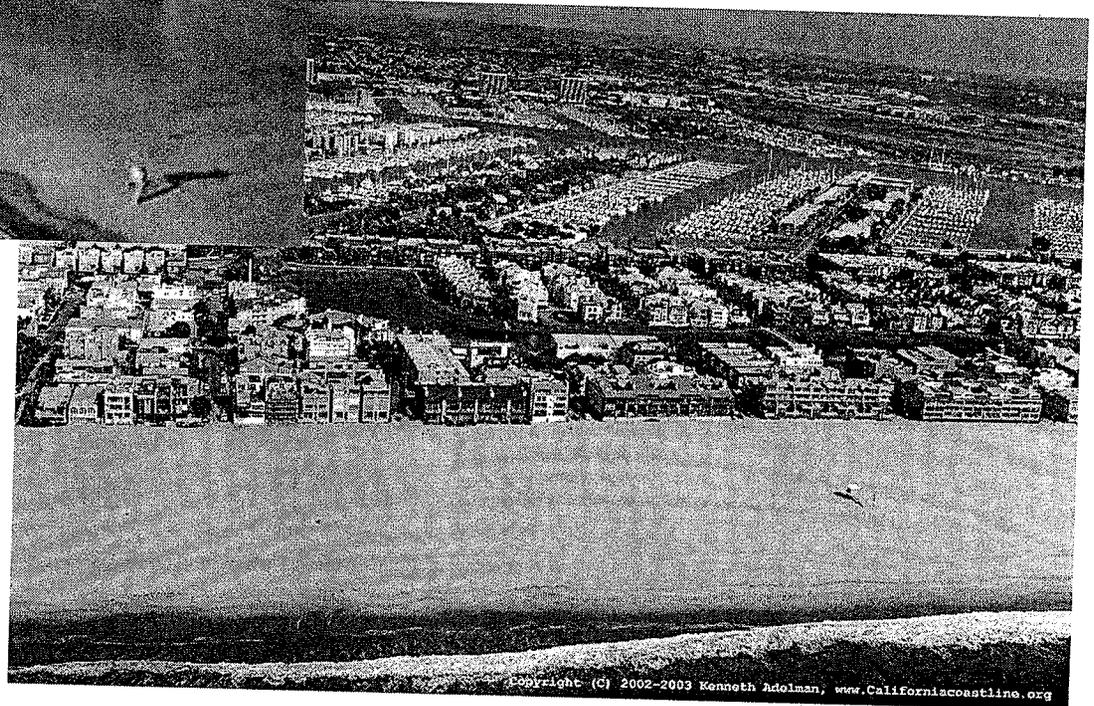
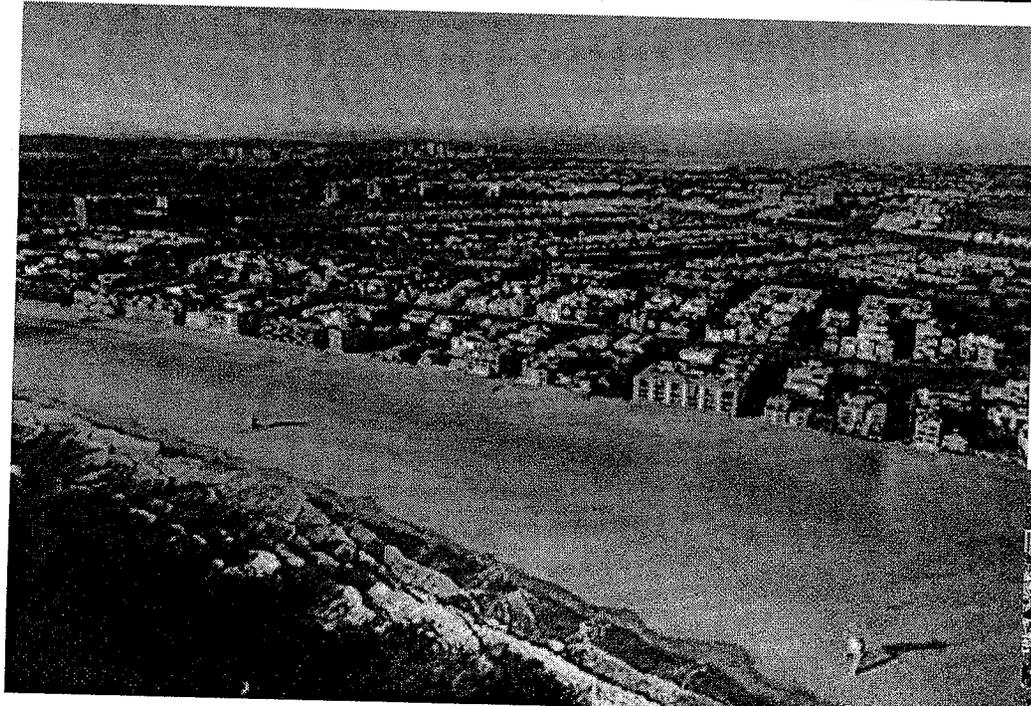
**Only protected beach launch access for personal watercraft in Los Angeles proper serving approximately 100 miles of coastline and inland communities**

# **The Premise**

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- Marina Del Rey is predicated upon providing low cost, recreational boating for the citizens of Los Angeles.
- Public parking for recreational boating use is protected in the LCP.
- Access to recreational boating is a priority use in the Coastal Plan.

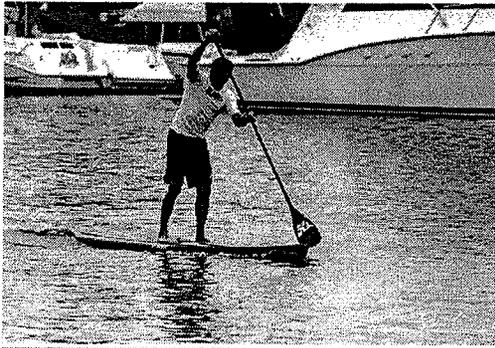
# Lack of Parking = Lack of Use



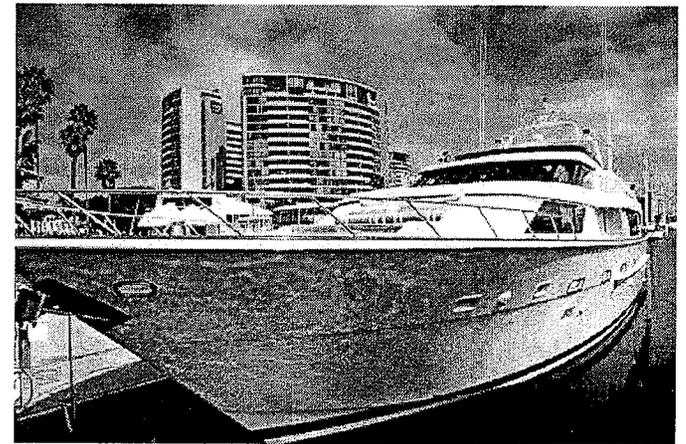
# Low Cost Recreational Boating

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Marina Beach access offers low cost of entry to experience the Marina



**VS**



Kids Programs- Free or Subsidized

Membership Based Organizations

Low Cost Personal Watercraft

# Users - Impact

- **Families**
  - Picnics, Day Use, Gatherings
- **Kids Programs**
  - Boys & Girls Club, Row LA, MDROCC Keiki, Kayaks for Kids, LAPD Explorers, SM Police Activities League
- **Individuals**
  - Kayakers, Stand-Up Paddlers, Paddleboarders, Outriggers, Rowers, Swimmers, Small Sail Boats, Volleyball Players
- **Events**
  - Learn To Row, Kahanamoku Klassik, Rowing Regattas, Malibu to Marina Paddle Championships
- **Organizations**
  - LA Rowing Club, Fairwind, Marina Del Rey Outrigger Canoe Club, United Rowing
- **Business Owners**
  - Local Restaurants, Markets, Equipment Supply, REI, Action Water Sports



# Considerations

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**A needs assessments and use patterns of Mothers Beach is necessary before making major Land Use changes, especially with the change from PARKING to RESIDENTIAL**

1. Which recreational boaters and beachgoers access the beach?
2. Which area of the beach is critical for recreational boating or other uses?
3. What parking lots are critical for access?
4. How do they use and access the beach? Where?
5. What are their needs?
6. When do they use the area?
7. How will changes in the area effect the future use and access of the beach?
8. How will changes effect the future growth of recreational boating?

# **What are the Needs of Marina Beach Users?\***

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- **Parking Proximity**
  - Time
  - Gear
- **Parking Affordability**
  - Frequency
- **Beach Access**
  - Safety
  - Ease of Launching
  - Loading/Unloading
  - Family friendly
- **Vehicle Accommodations**
  - Height/Length/Racks/Trailers
- **Storage**
  - Personal Water Craft

\* Partial listing / further research and study needed by County to understand user needs

# **What Won't Work..\***

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- **Loss of Current Parking**
- **Underground garages**
  - Elevators
  - Vehicle/PWC height issues
- **Remote Parking/Water Taxis/Buses/Shuttles**
  - Gear transfer
  - Time to get to/from beach
- **No unloading areas**
- **Lessees/Tenants**
  - Upset with noise/congestions/parking issues

\* Partial listing / further research and study needed by County to understand user needs

# **For The Record...**

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- **Correspondence from Marina Del Rey Community Boating Council members relating to Marina Beach sent to:**
  - **Design Control Board**
    - August 28, 2008
    - December 17, 2008
    - July 22, 2009
  - **Regional Planning**
    - April 2009 (as part of Community Working Groups)
  - **Coastal Commission**
    - April 8, 2009
  - **Beaches & Harbors**
    - April 3, 2010 (as part of Marina Beach Community Workshop)

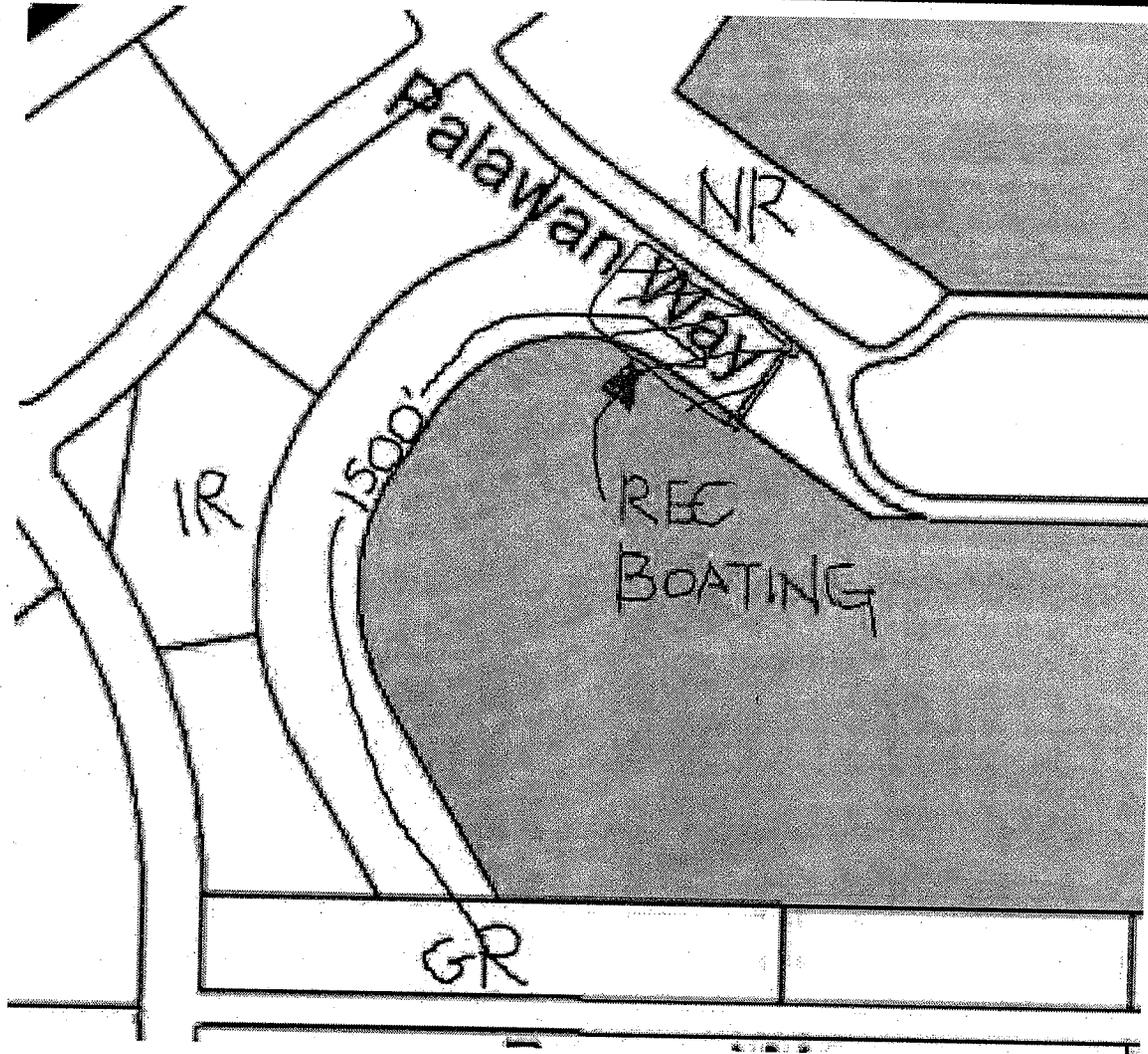
# All Parking Spaces Are Not Equal

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- Raju Associates Study flawed- combines 4 lots in M.B. Area
- Lot GR does not serve Marina Beach-1500 ft away
- Lot OT does not serve recreation boating- overflow only
- Lot IR serves picnic area- recreation
- Lot NR only serves recreational boating! Yet it is being rezoned residential.

# Uses Are Not Adjacent

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# Look at the Data! Flawed

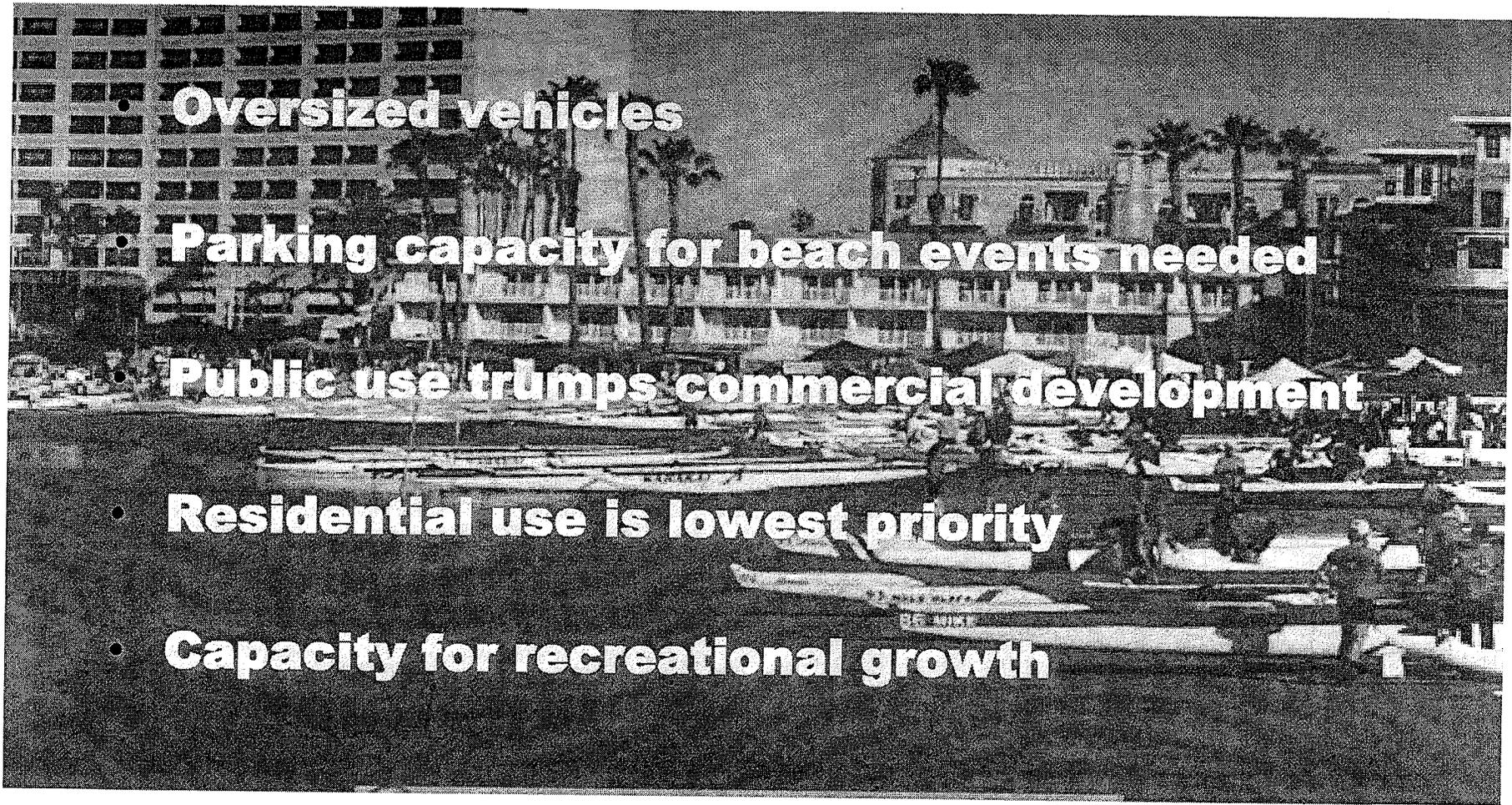
- County notified of draft report undercount- Raju went back out recounted
- Same parking count for NR (69 spaces)- HOW? (Appendix A3)
- Lot GR shows 15 public users max- why grow?
- Lot NR shows max use, Lot IR also.
- Where is county data from staff observation?

APPENDIX C-2  
FUTURE ANTICIPATED CONDITIONS PUBLIC PARKING DEMAND ANALYSIS BY DAY AND LOT

#	Activity Area	Lot Number - Parcel	Single Proposed Number of Spaces	Anticipated Future Public Parking Demand & Utilization Profiles																			
				Occupied Spaces on Weekdays										Occupied Spaces on Weekend Days									
				Day 1	Day 2	Day 3	Day 4	Day 5	Day 6 (Typical)	Day 7	Day 8	Day 9	Day 10	Day 11	Day 12	Day 13	Day 14	Day 15	Day 16	Day 17 (Typical)	Day 18	Day 19	Day 20
1	Mother's Beach	8 - OT	92	8	110	67	60	6	3	65	3	35	9	58	17	6	44	51	49	59	20	25	43
		9 - NR	69	50	75	61	67	84	62	64	120	112	123	125	139	124	129	122	127	151	109	142	131
		10 - IR	189	2	25	6	10	12	14	79	80	97	75	177	123	162	62	86	46	115	27	140	242
		11 - GR	382	45	63	68	36	34	34	53	17	17	13	22	22	18	22	17	24	17	14	15	17

# **Boating Needs Can't Be Served In a Residential Zoned Lot**

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- **Oversized vehicles**
- **Parking capacity for beach events needed**
- **Public use trumps commercial development**
- **Residential use is lowest priority**
- **Capacity for recreational growth**

# **Parking=Access, No Parking=No Access**

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- Recreational boating primary use
- Examine how beach is used
- Recreational boating survey needed
- Marina Beach is not single entity
- DO PLANNING!
- Decision made prior to data?

# **CEQA Required for Decisions**

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- Save Tara lawsuit. City of Bell lawsuit
- County leases were negotiated prior to LCP amendments or Studies
- County RFP's outlines project- predetermines scope and makeup of project, and change of use
- By definition, a decision was made regardless of permit status
- Decision requires CEQA

# **Pipeline Projects Redesign Marina**

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- Scope of overall change should require CEQA.
- 6 significant projects redesign Marina. Each require individual CEQA also, but with LCP Amendment approval will be expedited. CEQA circumvented.
- Decisions such as rezoning of parking lots to residential already done