

Recreational Boating Sub Group #2

County Guidance on LCP Recommendations

1. It is our opinion that the county appropriately commissioned a comprehensive study of the physical and economic aspects of the boat slips in Marina del Rey and has now circulated two draft reports. The first which is more concerned with the physical characteristics of the existing marina as it relates to the overall market was produced by Noble and Associates (“Noble report”). The second which was more concerned with overall rent levels compared to the market was produced by Alan D. Kotin and Associates (“ADK&A report”). We believe these reports have adequately addressed the issues at hand with the exception of the items transmitted to the county by the Marina del Rey Lessees Association (“Lessees Association Letter”) on April 21, 2009 (copy attached). We feel the major shortcomings of these reports which should be corrected include:
 - a. Clarify and provide more guidance as to how individual lease holds will be permitted to achieve the recommended slip sizes upon redevelopment.
 - b. Do not present highly speculative projects which are early on in the entitlement process as if they are done deals. Should these projects not go forward, the recommendations made in the reports would change substantially with respect to the reduction in the number of small slips.
 - c. Make an effort to include the future redevelopment plans for the 1,420 slips at six marinas which have not yet applied for reconfiguration. The ultimate slip mix at these marinas will have a significant affect the final size distribution in Marina del Rey.
 - d. Slip reconfiguration should be done in “substantial” compliance with DBAW guidelines giving the Director flexibility to achieve overall redevelopment goals without being handcuffed by hard and fast criteria.
 - e. Dry storage on parcel 77 should be retained as it represents the best example of low cost dry storage available in the Marina, unless and until it can be relocated to another county owned parcel properly zoned for boat storage.
 - f. Since dry stack storage is intended to satisfy the demand for an alternative and affordable option to wet slips, the economic study should include the projected rental rates required at the very unique structures being proposed. It is highly unlikely that the dry storage rents at conventional dry stack facilities will be comparable to the projects proposed in MDR.

2. Subject to the incorporation of the comments contained in the Lessees Association Letter, it is our opinion that the final recommendations made in the Noble report and ADK&A report should be utilized as guidance in determining the appropriate slip mix going forward. We strongly believe that the slip mix should address the needs of the current and future boating community and not mirror the status quo. In this regard, we feel there should be an equitable distribution of among all slip sizes without any over concentration in smaller slip sizes.

3. We agree that the funnel concept should be dropped as it would heavily impact alternative recreational uses for enhanced utilization of the marina by the general public. We believe there are many ways to increase recreational boating in MDR which should be investigated and implemented. These include:
 - a. Adding additional slips as may be feasible, especially at parcel 64, parcel ____ where we believe there is an opportunity for increased transient slips for larger vessels.
 - b. Adding dinghy docks at key destinations.
 - c. Encouraging small vessel charter operations through ground rent credits to successful operators.
 - d. Maintain a strong collection of yacht clubs open to the public.
 - e. Upgrade launch ramp facility and clean off bird droppings from launch docks.
 - f. Provide low cost docking facilities for youth organizations such as the Sea Scouts and W.A.T.E.R. program.

4. We agree that short-term day use docks should be required at all redevelopments, especially at commercial and retail parcels. Not only does this provide a good means for alternative transportation, it creates recreational opportunities within MDR. At present, there is little for a boater to do after leaving the dock or launch ramp other than go out the breakwater.
 - 4a. We feel that it is neither practical nor in best interests of the boating public to make a blanket statement proposing not to reduce the total number of boat slips or not to eliminate those slips less than 35 feet in length. We believe that MDR should be redeveloped to meet the current and future needs of the boating community and not to mirror the current configuration which was designed to serve boats constructed in the 1960's. In addition, the adoption of DBAW guidelines for marina design and compliance with ADA standards will by definition reduce the absolute number of boat slips. We recommend that reconfiguration be based upon the information gleaned from the Noble and ADK&A reports subject to the comments and guidance provided in the Lessees Association Letter.

Marina del Rey
Lessees Association

C/o Mr. Timothy C. Riley, Executive Director
8537 Wakefield Avenue
Panorama City, CA 91402
Telephone: 818-891-0495; FAX: 818-891-1056

April 21, 2009

Mr. Santos Kreimann
Director
Department of Beaches and Harbors
13837 Fiji Way
Marina del Rey, CA 90292

Re: Marina del Rey Slip Sizing Study
Marina del Rey Slip Pricing and Vacancy Study

Dear Mr. Kreimann:

The Marina del Rey Lessees Association submits the following comments, questions and suggestions in the matter of the above-referenced studies commissioned by the County of Los Angeles Department of Beaches and Harbors.

Marina del Rey Slip Sizing Study:

1. Page 1: Bullet point # 4: The report states that "more boats in the 30 foot length and less category are moving to dry boat storage". While we concur that a greater number of smaller boats should be placed in dry stack storage, we do not find that the report provides sufficient data to reach this conclusion. The consultant should be asked to quantify the number of boats under 30 feet that are moving to dry stack storage. Since there have been very few new dry storage facilities constructed within the market area, has the study included nationwide data outside of the market? If so, is this relevant to Marina del Rey?
2. Page 2: Table: We believe the Table requires more clarity. Does this Table mean that an individual marina should not have any slips under 30 feet when re-developed? But if the combined percentage is recommended to be 30% or less, how is this achieved? If the first marinas to be redeveloped drop all boat slips under 30 feet, then do the last marinas to be developed take the entire burden of providing the under 30 foot slips in order to maintain the 30% ratio? What does the Table mean by saying 30% of the

combined percentage for all MDR marinas is 30% for 30 feet and under? Does this include dry slips? What does it mean that the Table shows an apparently uneven redistribution of the percentages for the maximum case percentage for individual marinas? For instance, the 11% of slips 50 feet and over remains static, while all other categories 30 feet and above are adjusted upward.

3. The Table on page 2, along with the associated recommendations outlined in the Executive Summary, also fails to account for the fact that several anchorages, acting upon prior County policies, have already submitted proposals which minimize the potential for reconfiguration. The County has reserved the highest proportion of larger slips to those future projects which were not required to respond to prior invitations for Lease Extensions, and the County should reconsider the practical application of this policy.
4. Page 2: Since the Coastal Commission has recommended eliminating the Funnel Concept, and the recreational boating groups and environmental groups are opposed to it, then perhaps it should not be mentioned as a viable alternative.
5. Page 3: Bullet point #1: We should insert the word “substantially” before “meet the minimum requirements...” as the DBAW guidelines and the County’s design criteria for Marina del Rey are actually just guidelines and not requirements. By providing some flexibility, major changes in configuration may not become necessary in order to comply. This may provide a very cost effective solution for maintaining existing slip counts. It only makes sense that guidelines maintain more flexibility than specific requirements.
6. Page 4: Where has Marina del Rey become a “role model” for other urban marinas throughout the world”? While we appreciate the uniqueness of Marina del Rey and its appeal to boaters, this type of presumptuous comment seems inappropriate for a factual report unless it is supported by a number of specific examples that could be cited.
7. Page 6: The proposed slip count relies on the proposed dry stack projects at parcel 53 and 44 actually being constructed. Should these not be constructed the slip count will be reduced to 4,871 rather than to 5,343, resulting in a 677 slip reduction that represents a 12.2% decrease. Since these proposed dry stack projects are far from even obtaining their basic entitlements and CEQA review, this study should not assume their completion is a fait accompli in its analysis of the base case. Most importantly, since the total slip count is the very basis of this report’s fundamental conclusions, the validity and likelihood of these assumptions should be clearly set forth.
8. Page 7: It is important to note that only the currently proposed slip reconfigurations are included in this report. There are four marinas representing 894 slips which will have to be reconfigured in the next few years. In addition, there are two other marinas reconfigured in the 1980’s which will be up for reconfiguration in the next decade, representing another 526 slips. Together, these marinas represent a total of 1,420 slips

or 27% of the marina which is not included in this study. The reconfiguration of these marinas will likely involve a similar reduction in boat slips and an increase in length as discussed in this report.

9. Page 25: Boat registration number change by size categories. Do these numbers of registrations for smaller boats include personal watercraft? If so, the personal watercraft registrations should be removed, because they skew the numbers in favor of smaller slips for vessels that do not require small boat slips.
10. Page 37: It is inconsistent with the recommendations of this study that the existing dry storage on parcel 77 should be eliminated. Given the lower costs associated with the existing storage facility on this parcel, it would appear that the sensible recommendation is to retain this existing use.
11. Page 37: The report identifies Parcel 52/GG to provide dry stack storage for 349 boats and Parcel 44 to provide the same for 234 boats. Together, these two proposed dry stack storage facilities would provide more than half of Marina del Rey's total dry slips. These two projects are speculative in nature as they face many hurdles in obtaining entitlements in a protracted discretionary process, to say nothing of potential financing challenges.
12. The report has not addressed supportive landside services on marine/commercial properties to facilitate the use of visitor-serving commercial operations such as FantaSea Yacht and Hornblower. We recommend that the report discussion on the future marina should focus on providing these necessary supportive landside facilities for operators, large and small, who have licensed businesses.

Marina del Rey Slip Pricing and Vacancy Study

1. Page 1: Under "Key Findings of the Noble Consultants Report," the word "proposed" should precede "dry storages for smaller boats" in the last sentence of the first paragraph. This is important given the speculative nature of the two proposed dry storage facilities, which (as stated above under Item 11) still face considerable economic and entitlement challenges.
2. Page 8: Boat yards and other marina operators do not maintain vacancy to accommodate customers or for the purpose of other collateral uses. Other than minimal staging areas for haul out, all slips are rented to slip tenants and/or leased to sub-tenants.
3. Page 9: The difference between the so called "independently priced marinas" and other marinas seems to be overblown. It is our experience that all marina slips compete with all other marina slips based upon their individual characteristics and amenities and not

based upon whether there is a related upland business. This distinction should be further studied for its validity.

As an interested party to the redevelopment of Marina del Rey to serve our boating community and to enhance our recreational facilities, the Marina del Rey Lessees Association appreciates the independent study efforts that will assist in rebuilding our marinas to modern standards. We believe that these reports substantiate, to a large degree, what other studies have previously found, namely that Marina del Rey is in line with the marketplace and that the trend is to larger wet slips.

We look forward to working with the County as these studies move forward during the public review process.

Sincerely,

David O. Levine
President

(letter transmitted by email)