

October 30, 2008

Ms. Gina Natoli
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

Re: County response to Marina del Rey LCP Periodic Review

Dear Ms. Natoli:

In response to the Department of Regional Planning's request for public input into the County's response to the California Coastal Commission's Periodic Review ("Review"), We ARE Marina del Rey is already on record favoring a comprehensive, community-based planning approach. As co-authors of the key Review recommendation for a comprehensive amendment to the LCP, adopted by unanimous vote of the Commissioners and unequivocally reaffirmed earlier this month, **we believe that the County's response should be an immediate suspension of all development and redevelopment projects in the regulatory and proprietary pipelines until the comprehensive approach is fully implemented.**

We ARE Marina del Rey emphatically opposes the County's piecemeal approach to Marina planning issues, whether it concerns redevelopment projects or this Review response process. Regarding the former, please review the public record. As to the latter, we offer the following observations and discussion. We conclude with a challenge to the County to use this opportunity to make the Review a meaningful process that is not only responsive to community needs and concerns, but will begin to heal the disconnect the County has created with the public it purports to serve. We are all Marina del Rey, and by working together we can assure that the Marina community will continue to thrive while contributing significantly to the welfare of all County residents.

No substantial value of proposed workshops to the community:

We ARE Marina del Rey does not believe your proposal of public "workshops" offers any substantial value to the community in consideration of the investment of time and effort they will require from participants. Based on your statements at the initial public hearing on August 21, and the County's track record on Marina development issues including particularly this LCP Periodic Review, we believe that participants will find these workshops to be, ultimately, a waste of their resources. There are several reasons underlying this concern:

1. **Workshops not part of public record:** By your own acknowledgment at the August 21 DRP public hearing, these workshops will be off-the-record private meetings, and no public officials will participate. What this means is that the public will be giving input to itself, and the County will gather merely a distillation that lacks the fullness of their discussions and

supporting arguments. It contradicts your introductory statement of the very purpose of these workshops. *Full participation of the entire citizenry in the planning process is not accomplished by talking amongst ourselves, but rather through dialogue with the planners and decision-makers responsible for administration of the public trust.*

2. **Restricts opportunity for full public participation:** By dividing the community into separate committees, you create dilemmas and confusion for potential participants. What if someone has more than one area of interest, or multiple group associations? Does he need to sign up for several committees, and devote two or three times the amount of time? If she opts instead for a general committee of a specific group, will she miss opportunities for a more thorough or relevant discussion and report? What if their concerns do not fit neatly into any of your categories? And what happens if different committee recommendations conflict—do they cancel each other out, or will the County just pick the one it likes best? The discussion, as we said, requires a public dialogue among all stakeholders.

3. **Dubious status of workshop results:** The product of these workshops has, by your account, no defined weight or status, even within the narrowly restricted project parameters. You took great care at the August 21 hearing to deny prospective participants any assurance that the considerable work output of these proposed workshop committees would be included in the eventual County response to the Coastal Commission.

4. **Poor County record on consideration of public input:** The County's record on the Periodic Review from its January 2005 inception further erodes any confidence that your proposed workshops will receive appropriate consideration or weight in the County's response. Attachment 1 exposes the County's unfiltered attitude toward public involvement in the Review process. Based on long experience of those who have invested extensive time and personal resources on Marina del Rey development issues, including particularly this Review, the expectation is that the County will self-determine its final response to the Coastal Commission regardless of the outcome of these workshops, and any committee reports contrary to the County's position will be omitted, or restated, or dismissed as insignificant or unrepresentative.

5. **No impact of Workshops on other County actions:** By narrowly defining the scope and tasks of these proposed committees, you preclude any impact the community might hope to gain in the ongoing development process in Marina del Rey. It was abundantly clear at the August 21 hearing that the community desires and demands more of a participatory role, yet your responses to those queries were negative.

The Challenge:

Throughout the LCP Review process, the County has steadfastly declined to provide a proper context for either understanding or assessment of the County's development plans. We ARE Marina del Rey challenges the County to create a meaningful public planning process that respects the Marina del Rey community and honors both the letter and intent of our existing laws and policies. It can begin with this Review response process, as follows:

- First, declare all Mdr development and redevelopment projects currently in the pipeline or under negotiation in abeyance until the LCP Review process is completed. This is the obvious way to deal with the unfair advantage that County/developer partnerships derive from the statutory one-year response period, during which they will continue to build

compelling financial pressures in favor of projects and project-driven amendments—which are a major issue of the Commissioners’ recommendations. This suspension will have a dual benefit. First, it will motivate the County to complete its official response promptly (we heard the unofficial one on August 21). Second, it will allow the planners who currently work on regulatory and proprietary issues to participate in the response process, giving the public the forum it deserves and the planners the benefit of a better understanding of the community and regional needs and impacts that most concern those affected by redevelopment;

- Undertake, as priority, to immediately begin a program of public information meetings to educate the greater community about the comprehensive County plan for Marina redevelopment, in preparation for public participation in a comprehensive revision to the LCP. These meetings should include a discussion of House Document 389, the revenue bond’s impact on landside development, the Coastal Act and our LCP, the AMS, future recreational needs of the region, and the conflict of interest between the mutual support/defense clause in contracts with lessees and the County’s obligation to protect the public trust. Additional materials would include reconciled status report & map, with an accounting of used development credits for each zone and a list of parcels that have not yet been negotiated. Meetings should also include a table display of the model that is secluded behind glass on the wall of the Chase Community Room and largely obscured from public scrutiny. A fair and balanced presentation is crucial, and We ARE Marina del Rey, along with other community organizations, will gladly assist the County in presenting an alternative plan to provide that balance.

We ARE Marina del Rey urges all Marina stakeholders to voice their recommendations on the County’s response to the Marina del Rey LCP Review. We do not believe the proposed community workshops are an effective means for them to do so, and ask the Departments of Regional Planning and Beaches & Harbors to work together on a viable alternative as described above. The future prosperity of our community is at stake.

Thank you for your consideration.

Together,
We ARE Marina del Rey,

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Attachment 1: DBH letter to CCC staff