

CALIFORNIA COASTAL COMMISSION

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F16a

PWP Amendment No. PWP-4-CIH-21-0005-1 (Slip Mix)

JUNE 8, 2022

CORRESPONDENCE



June 10, 2022

Chair Donne Brownsey
Vice Chair Dr. Caryl Hart
Commissioners
California Coastal Commission
455 Market Street, Suite 300
San Francisco, Ca. 94105

Re: June 10, 2022 Channel Islands Harbor Public Works Plan Amendment No. PWP-4-CIH-21-0005-1

At this time the Harbor & Beach Community Alliance takes no position regarding the proposed Public Works Plan Amendment #7 (PWPA7) to reduce the total number of boat slips from 2150 to 1950, a 9.3% and 200 slip reduction. The new County Harbor Director has begun to take some positive steps towards revitalizing Channel Islands Harbor. Work is being done to ensure transparent published development policies and processes. However, we believe it is important for the Commission to be aware of our concerns for the long-term protection of this harbor, a rare and irreplaceable public coastal resource.

- 1) This PWPA7 continues the piecemeal planning of the harbor's development. It again amends only the waterside areas of the harbor and does not update the landside areas of the harbor as repeatedly recommended by this Commission and the public. Both the landside and waterside plans are old and outdated as this PWP makes evident. Without a harbor master plan for the entire harbor (not just 6 parcel areas), there is no way to be sure that the harbor in the long-term will meet its objectives of a "harbor", a water recreational area with lower cost water recreational activities.

It is difficult to understand why Ventura County and the City of Oxnard are able to update its local coastal plans while Channel Islands Harbor seems unable to update its Public Works Plan that is over 35 years old.

As the staff report has noted, the PWPA7 was triggered by the harbor's application for a Notice of Impeding Development (NOID) for Peninsula Yacht Anchorage's marina replacement and expansion submitted to the Commission in January 2021. The Coastal Commission staff declared the NOID application incomplete in February 2021. The reason given was the NOID was not consistent with the current PWP because the Peninsula Yacht Anchorage's marina plan would result in slips of Category A (boat slips under 32 feet in length) and slips of Category B (slips between 32 and 38 feet in length) falling below the required minimum 23% of total slips harbor-wide. A PWPA is, therefore, needed to proceed with this marina's rebuild or the rebuild plan would need to be altered to meet the PWP slip requirements.

- 2) As far as we are aware, there has been no physical inventory done of the harbor's boat slips since 2008. The slip numbers provided reflect those reported by marina lessees, not necessarily what is actual and usable. As Channel Islands Harbor is an important public coastal resource, we have requested an audit be done of the harbor's boat slip inventory by the County's Internal Audit

Department. We received confirmation on July 27, 2021 that the matter of boat slip inventory and revenue will be included in their Audit Plan for FY 2021-22. We received reconfirmation on May 24, 2022 that the Audit Department will be launching the audit in the coming fiscal year beginning July 1, 2022.

The total number of slips (2150) and their sizes is what was last reflected in the Public Works Plan in 2008 for PWPA3. It is also unclear if there is a standard and consistent method of counting boat slips. The Harbor Department has indicated the numbers can fluctuate with how slips are rented and occupied. These may be questions that the Internal Audit and Controller's office may help in clarifying, as slips and docks support public access to water recreation.

- 3) It may be helpful to better understand why vacancy rates for harbor slips are high. Much of Channel Islands Harbor has been allowed to deteriorate for more than a decade and there are currently very few attractive public amenities available. The slip vacancy rate appears to also include unusable slips due to deterioration and weather damage. No data was provided regarding the number of unusable slips that are clearly evident at the harbor. Both of these factors can impact boat slip vacancy rates. During the COVID pandemic, small electric boat sales at Channel Islands Harbor were at an all-time high. In the future other marina rebuilds will also be subject to current ADA and other marina requirements that will also impact slip count.

When the harbor is appropriately developed and revitalized, demand for boat slips may go up, even those for small boats. These are issues that should be considered in a strategic long view harbor master plan that is clearly needed for this harbor whose Public Works Plan is more than 35 years old.

- 4) Though there has been the addition of boat slips north of the Channel Islands Boulevard bridge as the Harbor Department pointed out in its November 17, 2021 letter to the Commission staff, most of those slips are privately owned by the waterfront homeowners and those available for lease or rent to the public are far less than what is implied in that letter as can be seen on those marina websites.
- 5) It should be noted that parcel Q, where the "temporary" dry dock with 87 boat capacity is located, has been identified for possible development. This may impact future dry dock availability with dry dock vacancy reported currently at 10%. As the staff report points out, "One explanation for this trend [high vacancy rates of small boat slips in the Harbor] is that many small boat owners prefer storing their smaller boats in dry dock over wet slips, since dry dock storage is typically less expensive and requires less maintenance of boats." It should be noted that it is not practical to dry dock small electric boats which are popular at this harbor.

HBCA believes the Commission should be aware of these issues and concerns that PWPA7 raises and the need for them to be rectified in the near future. We recognize and commend the Ventura County Harbor Department for its recent actions to improve and revitalize the harbor but much more needs to be done and these efforts must continue to maximize public access and enjoyment of Channel Islands Harbor, a rare coastal asset.

Rene Aiu on behalf of the Harbor & Beach Community Alliance

cc: Jack Ainsworth, Steve Hudson, Isabel Qi



June 2, 2022



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Commissioners
California Coastal Commission
455 Market Street, Suite 300
San Francisco, Ca. 94105

Subject: June 10, 2022 Item 16
Channel Islands Harbor Public Works Plan Amendment No. PWP-4-CIH-21-0005-1 (SlipMix)

Dear Coastal Commission Staff

The Channel Islands Waterfront Homeowners Association (CIWHA), represents the 750 boat dock homeowners of the first and oldest development north of the bridge in Channel Islands Harbor in the area, referred to as Mandalay Bay or "North Harbor".

We support the intent of PWPA 7 to accommodate improvements to the docks in Marinas south of the bridge as many have been in disrepair for a very long time and the only ADA Compliant dock is located at the Boating Center and access is closed to the public. However, we request consistency in the manner in which the County recognizes existing development in the North Harbor.

8/12/2020, the Coastal Commission denied the last PWPA 7, following years of dispute over the County's request to allow high density residential units for Fisherman's Wharf. At that time the County refused to consider the existence of over 1800 residential units on the North Harbor, as it did not support their request for the development of additional residential units in the Fisherman's Wharf in the South Harbor.

At this time the County is requesting to reduce the number of boat slips in the South Harbor. They support that request by recognizing the existence of docks/slips in the North Harbor. This inconsistency in recognizing existing improvements in the North Harbor is conflicting and not in keeping with the County's prior argument.

This comment is specifically regarding the first paragraph on page 3 of the letter dated November 17, 2021 from the Harbor Department:

Steve Hudson, District Director
Deana Christensen, District Supervisor
Isabel Qi, Coastal Program Analyst
California Coastal Commission
SUBJECT: Submittal of Amendment to the Channel Islands Harbor
Public Works Plan (Amendment No. 7)

November 17, 2021
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Adding to the change in market conditions is the addition of slips north of Channel Islands Blvd. bridge in the Seabridge and Westport developments in the City of Oxnard. There are approximately the same number of slips available north of the bridge as there are in Channel Islands Harbor. For boat owners who are willing to be further away from the ocean, these slips represent a more economical option.

June 2, 2022



Subject: Submittal of Amendment to the Channel Islands Harbor Public Works Plan (Amendment No. 7) to Modify Total Number of Wet Slips and Amend the Percentage of Small Slips within the Waterways of the Harbor.

We would like to further clarify that the majority of docks/slips in the North Harbor are privately owned and not for public use. Approximately 300+ slips are public slips in the Seabridge and Westport Marinas as indicated on the included images and map. The remainder of the docks/slips are private and are tied to homeownership vested in the individual homeowners.

We as residents and stakeholders in the North Harbor, request that all development in either South or North Harbor consider the Harbor as a whole.

Thank You!

Bill Clark

Bill Clark

President, Channel Islands Waterfront Homeowners Association

<https://channelislandsca.com/>.

CC: "Michael Tripp" <Michael.Tripp@ventura.org>

The following images are visual references to clarify our letter



June 2, 2022



