

Key, Lori

From: Rene Aiu <aiurene@gmail.com>
Sent: Monday, July 25, 2022 1:04 PM
To: ClerkoftheBoard
Subject: Item 22 Harbor Department July 26, 2022
Attachments: Final_CCC_re-_PWPA_7_June_10_2022 Letter.pdf

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Please include the attached letter for the record on Item 22. Please advise the Board of Supervisors that this was a letter submitted to the Coastal Commission regarding their June 10, 2022 hearing on the harbor's proposed Public Works Plan Amendment #7.

We would like the Board of Supervisors to note that the Internal Audit Department has committed to including the harbor's boat slip inventory issue in their Audit Plan for FY 2021-2022.

We would appreciate inclusion of this email and the attached letter in the documents on this item as a matter of record and a copy of such sent individually to each Supervisor.

Thank you. Please let us know if you have any questions.

Rene Aiu on behalf of the Harbor & Beach Community Alliance



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 Both the landside and waterside plans are old and outdated as this PWP makes evident.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

