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A PUBLIC ENTITY SERVING CHANNEL ISLANDS BEACHES AND HARBOR • CHANNELISLANDSBEACHCSD.COM

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July 14, 2017

Wesley Horn, Coastal Program Analyst
California Coastal Commission
89 South California Street, Suite 200
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The Channel Islands Beach Community Services District (CIBCSD or District) is a government agency organized under California Government Code 61,000 et Seq. Our Agency is governed by a five-member Board, elected from registered voters from within our District boundaries. Our community surrounds and has contiguous boundaries around the Channel Islands Harbor (Harbor). Additionally, CIBCSD provides water service to the Harbor. The District Board represents the residents of the unincorporated communities of Hollywood Beach, Hollywood-by-the Sea and Silver Strand Beach. Developments within the Harbor impact our communities in both positive and negative ways.

Over the years, the District has opposed the piecemeal development of the Harbor. We have communicated this concern to the California Coastal Commission (CCC) on numerous occasions, with the first correspondence occurring in 2003. The District favors a comprehensive update to the Harbor Public Works Plan, which was last updated in September of 1986. A comprehensive update of the Harbor Public Works Plan would allow all interested parties to know and evaluate the long-range development goals of the Channel Islands Harbor.

Currently, the County of Ventura's Harbor Department is once again attempting a piecemeal development of the Fisherman's Wharf Parcel with the proposed Amendment # 7. Amendment #7 calls for the development of approximately 400 exclusive high rise apartment units to replace the existing Fisherman's Wharf.

The District **OPPOSES** Amendment #7 for the following reasons:

- Amendment #7 is a continuation of the piecemeal parcel-by-parcel development process that circumvents the procedural and planning requirements of developing a comprehensive Public Works Plan.
- Amendment #7 creates serious traffic issues to the intersection of Channel Islands Boulevard & Victoria Avenue, with considerable impacts to the level of service for the intersection.
- Amendment #7 proposes to build exclusive private development on public lands in the Coastal Zone. County Harbor Department has refused to submit Amendment # 7 to the City of Oxnard to evaluate the proposal, to determine if the City will amend their Local Coastal Plan (LCP) to include the proposal. This refusal is a violation of the California Coastal Act.

Again, the CIBCSD Board of Directors, after reviewing the proposal and receiving a presentation from County Harbor staff and the developer of the proposed project, does hereby **OPPOSE** the Harbor Department's Amendment #7. Furthermore, the District supports the City of Oxnard's request of the County to submit any proposed development of the Harbor to the City's LCP amendment process for review.



Susan Koesterer, President of the Board
Channel Islands Beach Community Services District

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