

Communication from Public

Name: California State Lands Commission
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Comments for Public Posting: Attached, please find a comment letter from California State Lands Commission staff.



CALIFORNIA
STATE LANDS
COMMISSION

STATE OF CALIFORNIA
GAVIN NEWSOM, Governor

100 Howe Avenue, Suite 100 South
Sacramento, CA 95825-8202

MATTHEW DURLAO, PhD, Executive Officer
Reception: 916.574.1900
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April 14, 2026

Submitted via public comment.

File Ref.: G05-04

City of Los Angeles
200 N Spring Street
Los Angeles, CA 90012

Subject: Proposed Charter Amendments – Port of Los Angeles

Dear Members of the City of Los Angeles Trade, Travel, and Tourism Committee,

California State Lands Commission (Commission) staff is aware that the City of Los Angeles is considering amendments to its City Charter or Municipal Code related to its granted tide and submerged lands, which form the City's Harbor District and include the Port of Los Angeles. The amendments would place the Port's Public Access Investment Plan into either the City Charter or Municipal Code and require a workforce impact disclosure as a condition of approval for any lease, lease extension, lease amendment, or proposed development of Harbor Department property that requires a Coastal Development Permit.

The Legislature granted the City of Los Angeles, in trust, filled and unfilled sovereign public trust lands pursuant to Chapter 656, Statutes of 1911, and Chapter 651, Statutes of 1928, as amended. Under the City's granting statutes and the Public Trust Doctrine, land use decisions for the City's granted lands must be made to further the interests of the statewide public. (Public Resources Code sections 6009, subdivision (d); see, e.g., *City of Long Beach v. Morse* (1947) 31 Cal.2d 254, 262.) As grantee, the City also has fiduciary duties to the State. (Public Resources Code section 6009.1.) The State Lands Commission is statutorily required to oversee the City's management of sovereign public trust lands and assets. (Public Resources Code section 6301; *State of California ex rel. State Lands Commission v. County of Orange* (1982) 134 Cal App. 3d 20, 23.)

When considering amendments to the Charter or Municipal Code that implicate the City's management of its granted lands, the City must ensure that the changes are consistent with its duties as the State's grantee. In accordance with the

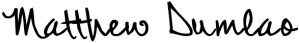
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Commission's oversight responsibilities, Commission staff are monitoring the proposed changes. Commission staff are happy to help address any questions the City may have regarding the requirements of its granting statutes or the Public Trust Doctrine, or to otherwise assist with navigating these requirements. Please contact Jeff Plovnick, Granted Lands Management Specialist, at Jeff.Plovnick@slc.ca.gov to coordinate on providing such assistance.

Sincerely,

Signed by:

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4/14/2026