

Communication from Public

Name:

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Council File No: 26-0489

Comments for Public Posting: See Attached June 25, 2026 letter from State Lands Commission regarding amendments Motion 67C (requiring the public access investment plan) and Motion 67G (requiring a workforce impact disclosure).



CALIFORNIA
STATE LANDS
COMMISSION

STATE OF CALIFORNIA
GAVIN NEWSOM, Governor

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Sacramento, CA 95825-8202

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June 25, 2026

Submitted via Council File 26-0489

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 Honorable Members of the Los Angeles City Council,

California State Lands Commission (Commission) staff is aware that the City of Los Angeles is preparing amendments for 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. We previously sent letters to the Trade, Travel, and Tourism Committee and the Rules, Elections and Intergovernmental Relations Committee on the proposed amendments. These amendments were proposed through Councilmember McOskey's Motion 67C (requiring the public access investment plan) and Motion 67G (requiring a workforce impact disclosure).

The City's management of its granted lands, whether through the Board of Harbor Commissioners or through the City Council, must comply with the City's duties as the State's grantee. 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 §6301; *State of California ex rel. State Lands Commission v. County of Orange* (1982) 134 Cal App. 3d 20, 23.)

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Commission staff appreciates that Motion 67C explicitly confirms that the public access investment policy must be consistent with the State Tidelands Trust. To avoid inadvertent confusion over the effect of Motion 67G's workforce impact disclosure requirement, staff encourages the City to also explicitly confirm that, regardless of any required workforce impact disclosure, the Board of Harbor Commissioners must comply with the City's duty to act in the statewide public's best interests, and not purely local interests, when managing granted tide and submerged lands. (See Public Resources Code sections 6009, subdivision (d).)

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 Jeffrey.Plovnick@slc.ca.gov, or Benjamin Johnson, Staff Attorney, at Benjamin.Johnson@slc.ca.gov, to coordinate on providing such assistance.

Sincerely,

Signed by:

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Matthew Dumlao, PhD

Executive Officer, State Lands Commission