



February 1, 2021

Delivered via email

To: Jayme Timberlake
cc: Encinitas Planning Commission
City of Encinitas
505 South Vulcan Ave
Encinitas, CA 92024

Re: Agenda Item 6A: Beacon's Beach Landscape Restoration Plan

Dear Ms. Timberlake,

The Surfrider Foundation San Diego County Chapter (Surfrider) recognizes beaches as a public resource held in the public trust. For more than twenty years, the San Diego Chapter has reviewed and commented on shoreline management projects and policy in San Diego County as part of our goal to safeguard our oceans, waves, and beaches. We recognize that Item 6A on today's planning commission agenda includes a staff recommendation for continuance until February 18, 2021. Having long been involved in the bluff stabilization conversation at Beacon's, we would like to take the opportunity to express our concerns about the project in the hopes that the Planning Commission may encourage work towards addressing them proactively in the coming weeks.

Background

Surfrider has been providing comments on bluff stabilization at Beacon's for nearly twenty years, including providing comments on the original 2003 proposal to build a seawall, issuing a Policy Statement in July 2014¹, attending various meetings with city staff and Councilmembers, submitting a letter concerning the Bluff Stabilization Preferred Alternative in March 2017², and receiving presentations from consultants in 2015 and 2017. We attended the July 2018 Planning Commission Hearing and subsequent workshops with the community. We also attended the Beacon's Bluffs Plant Restoration Stakeholder Meeting in November 2020 and are thus aware that

¹<https://sandiego.surfrider.org/surfrider-issues-position-statement-on-erosion-at-beacons-beach/>

²https://drive.google.com/file/d/0Byx7bL_cFxruenIzd0w0WF1jVUk/view



the main goal of the proposed restoration plan is to lessen surface erosion and stabilize soil at Beacon's Beach. **We are concerned that by focusing on the most uncontroversial of stakeholder requests, the city is now proposing a project that fails to mitigate the imminent and longer-term public safety and loss of public access threat in the area.**

Beacon's Beach Bluff, Beach, Parking Lot and Coastal Access Trail are Unsafe
Safety concerns at Beacon's are not new, and the threat of loss of beach access due to bluff collapse is very real. Over 35 years ago, landslides at Beacons destroyed both southern and northern beach access points at Leucadia State Beach, which included Beacon's. The current switchback trail is in danger of collapse. This is documented in the Leucadia State Beach General Plan at page 15³:

Recent Landslide

During November and December 1982, high tides, strong winds, and the associated wave energy triggered a large landslide at the southern access to the state beach. The landslide movement was triggered by wave undercutting, which caused the concrete stairway to break and drop. The landslide continues to be active. Failures will continue until the entire slope readjusts itself to a gentler gradient. This area may remain unstable for several years. The northern stairway was damaged in April 1983.

Analysis of aerial photos shows this area to be historically active. The landslide was observed during an 1897 topographic survey performed by the railroad. It had been inactive until November 1982.

Policy: No new stairways shall be constructed at Leucadia State Beach accesses until a geological evaluation determines that the landslides are stable. Until safe access is provided, pedestrian access shall be discouraged at this location to minimize the public safety hazard, and to prevent future accelerated erosion caused by foot traffic.

The City is well aware of the risk of failure of the bluff at Beacons having received multiple reports on stability, the last of which we are aware of is the AECOM geotechnical report from 2018⁴. The report indicates that all analyzed failure planes had stability Factors of Safety (FOS) at or less than 1.5 for the upper bluff, rendering them "unstable," and at least two deeper planes had FOS less than 1.5. The City of

³ <http://www.parks.ca.gov/pages/21299/files/653.pdf>

⁴ <https://encinitasca.gov/Portals/0/City%20Documents/Documents/Development%20Services/Engineering/Capital%20Improvement/Beacon%27s%20Beach/Geotechnical%20Reports/Beacons%20CFQA%20Landslide%20Assessment%20AECOM%207-5-2018.pdf>



Encinitas Local Coastal Program Land Use Plan Policy 9.14 requires development at Beacon's to maintain a FOS 1.5⁵. The report also states that relatively low seismic shaking (in this active fault area capable of producing large earthquakes), would lead to bluff collapse:

“analyses indicate that relatively low seismic shaking as low as 0.24g or less would produce a factor of safety of 1.0 (indicating incipient failure) (Coastal Bluff and Landslide Stability, page 2)”

The bluff, as well as sections of the parking lot, coastal trail, and beach, are at imminent risk of landslide impacts. **Our concern is not that the city disagrees with this point, but that the city is proposing to address deep seated catastrophic bluff collapse with surface-level erosion control planting solutions. The futility of the current project in the long-term is clear.**

The City Must Maintain a Safe Coastal Accessway

Surfrider would like to remind the city that lessening surface erosion and stabilizing soil to a degree will not address landslide risks, sea level rise, or coastal erosion in a way that ensures public access and safety. Ensuring public access and safety is required by the Coastal Act Section 30210⁶:

“Maximum public access and recreational opportunities should be provided when they are consistent with public safety, private property rights, and natural resource protection (Section 30210)”

Additionally, Coastal Act Section 30212 states⁷:

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

⁵ <https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/POD13-009/LUP.pdf>

⁶ <http://www.coastal.ca.gov/laws/>

⁷ <http://www.coastal.ca.gov/laws/>



Conclusion

We recognize attempts to maintain coastal access at Beacon's but the clock is ticking on tougher decisions. Since 2018 Surfrider has maintained that a safe, environmentally preferred solution is possible in the form of a parking lot reconfiguration and construction of a new beach access stairway. Alternatively, removing the unstable bluff portion and reconfiguring the bluff trail appropriately would be a preferable solution. We appreciate plant restoration at Beacon's as a project that may address superficial erosion issues on the bluff, but we are highly concerned that this is not currently paired with any real comprehensive plan to address imminent bluff collapse. The current restoration plan should not be seen as a solution to the access and safety issues at Beacons. We appreciate the city's willingness to work on this issue and ask for clarification as to when a long term plan will again be undertaken by the City.

Sincerely,

Jim Jaffee & Kristin Brinner
Co-chairs, Beach Preservation Committee
San Diego Chapter of the Surfrider Foundation

Laura Walsh
Policy Coordinator
San Diego Chapter of the Surfrider Foundation