



July 8, 2022

Delivered via email

To: Donne Brownsey, Chair
California Coastal Commission

cc: Jack Ainsworth, Executive Director; Karl Schwing, San Diego Coast District Director

Re: Item W21a, Application No 6-05-072-A2, Applicant: Las Brisas Homeowners Association

Honorable Chair Brownsey and Commissioners,

The Surfrider Foundation is a nonprofit grassroots organization dedicated to the protection and enjoyment of our world's ocean, waves, and beaches through a powerful network. Thank you for the opportunity to comment on this project.

When this permit application was originally heard by the City of Solana Beach in February 2022, we requested that the City require additional mitigation for the proposed return wall extension. To support this request, we cited Special Condition #2 of the Commission's 2005 approval of the original seawall (CDP #6-05-072) which required that if the permittees request to enlarge or reconstruct the seawall within its initial design life, then *"the permittee shall provide mitigation for the effects of the additional size of the seawall or the extended effects of the existing seawall on shoreline sand supply and public recreational use for the expected life of the seawall beyond the initial 22 year design life."*

We thank staff for their thoughtful response to our concerns, and agree with staff's recommended Special Condition A2-4 (Permit Term), which authorizes this development on a temporary basis only. By conditioning the authorization of this development only until the original expiration date of the 2005 permit, it ensures that appropriate additional mitigation for impacts to sand supply and recreational resources will be addressed. We have seen in the past that permit conditions are ignored by applicants, so we ask if this condition could be strengthened by imposing financial penalties if the required CDP amendment application is not submitted by November 21, 2027.

We also wanted to thank staff for including the permit history of this condo association. It serves as an important reminder of the increasing perils our public beaches face caused by reckless coastal development cited too close to the bluff's edge, and the continued need to construct more beach- and bluff-destroying coastal armoring to protect these threatened structures. Just over 10 years after the original condos were built, preventative seacave fills were approved. 20 years after the condo's construction, a 120-ft long seawall was required to protect the condos. Clearly the original development wasn't located a safe distance from the bluff's edge and now the public's beaches have been compromised because of these poor design and permit decisions.

Sincerely,

Kristin Brinner & Jim Jaffee
Residents of Solana Beach
Co-Leads of the Beach Preservation Committee
San Diego County Chapter, Surfrider Foundation