



March 28, 2022

Delivered via email

To: Oceanside Planning Commission
Tom Rosales, Chair
Tom Morrissey, Vice-Chair
Louis Balma
Susan Custer
Jolene Hayes

Re: RC21-00012, 909-1027 South Pacific St

Honorable 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. We want to echo the concerns raised by the Coastal Commission regarding this proposed revetment project:

- A portion of the proposed development likely falls within the Coastal Commission's original permit jurisdiction.
- Oceanside's Local Coastal Program (LCP) requires that impacts to sand supply resulting from shoreline protective devices be eliminated or adequately mitigated.

As a portion of the proposed development is within the Coastal Commission's original permit jurisdiction, the project should be approved through issuance of a Coastal Development Permit (CDP) from the Coastal Commission. The Commission's Mapping Division has reviewed information provided by the City and has confirmed a bisected jurisdiction, with a portion of the project located within the Commission's permit jurisdiction. Additionally, based upon the project description, the replacement of filter fabric would include removal of rocks and grading of elevations below the Mean High Tide Line and is therefore also within the Commission's original permit jurisdiction.

Regarding the mitigation for the loss of sand associated with shoreline protective

devices, the City's LCP includes a number of provisions that require mitigation be provided for the loss of sand, including the following:

Land Use Plan section III – Water and Marine Resources; Diking, Dredging, Filling and Shoreline Structures; and Hazard Area

Objectives

The City shall regulate diking, dredging, filling and erection of shoreline structures in order to minimize adverse environmental impacts, reduce public safety hazards, and where feasible, enhance public recreation opportunities.

Policies

6. Revetment, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate impacts on local shoreline sand supply. Such structures shall be designed and constructed to minimize erosive impacts on adjacent unprotected property and minimize encroachment on to the beach. The structures shall not interfere with access along the beach. The property owner shall dedicate all area seaward of the shoreline structure for lateral access for the public.

Given the concerns raised about jurisdiction and mitigation, we respectfully request that the Planning Commission deny the request for a regular coastal permit and instead that the applicants apply for a CDP from the Coastal Commission. If this action is not taken, we plan to appeal this project to the Coastal Commission.

Sincerely,

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

Mitch Silverstein
Policy Manager
San Diego County Chapter, Surfrider Foundation