



June 26, 2023

Delivered via email

To: Encinitas Mayor and City Council

Re: Item 10A, Support for Staff Recommendation to Deny Appeal of Beacon's Parking Lot Plan

Honorable Mayor and City Council,

Surfrider Foundation is a nonprofit environmental organization that engages a vast volunteer network of ocean users to protect our world's ocean, waves, and beaches for all people. Our San Diego County Chapter represents thousands of ocean recreation users — from dedicated surfers to occasional beachgoers — as well as the coastal communities and economies that rely on them throughout the region. We recognize beaches as a public resource held in the public trust, and the preservation of beaches and public beach access is core to our mission. We appreciate the opportunity to comment on the Beacon's Beach Parking Lot Plan.

We support staff's recommendation to deny this appeal and allow the parking lot relocation to move forward, as supported by the City's Planning Commission on May 4, 2023. We also agree with staff's findings, as summarized in the Staff Report, that detail why each of the appellant's grounds for appeal are neither relevant nor appropriate to this project. The appeal follows a clear pattern of behavior from a vocal minority to oppose any development at Beacon's that does not involve bluff stabilization. While bluff stabilization might offer additional protection from erosion for the properties of adjacent blufftop homeowners, it would negatively impact Beacon's beach and is in clear violation of the Leucadia State Beach General Plan:

Policy: The state-owned cliff faces at Leucadia State Beach shall not be fortified with retaining walls. Seacliff retreat is recognized as a natural process that cannot be permanently stopped. Erosion control should be limited to mitigating the detrimental effects of increased runoff from the clifftops and to planting native vegetation on the cliff faces. Seawalls shall not be constructed at the state beach.¹

The City of Encinitas has an obligation under its park maintenance agreement to maintain Leucadia State Beach, including Beacon's Beach. As such, Encinitas cannot approve a retaining wall, seawall or similar device and has been advised so on numerous occasions. The City has done an admirable job adding native vegetation to the extent possible in compliance with the General Plan.

¹ P.14 of the [Leucadia State Beach General Plan](#)



Surfrider has consistently opposed retaining walls at Beacon's beach as early as 2001 because they would result in long-term damage to the beach itself as well as being inconsistent with Leucadia State Beach General Plan. The science is clear on the negative impacts of shoreline armoring; we need not look further than to the armored bluffs on either side of Beacon's, where the beach has subsequently eroded and becomes unwalkable at higher tides. A Beacon's seawall would interrupt the landward erosion of the bluff and rob the beach of a natural sand replenishment source, *while* increasing erosion of existing beach area and surrounding beaches. The result would be, at best, temporary protection of the existing parking lot and bluff trail, coupled with a narrowing beach that is eventually drowned completely by an encroaching ocean.

Meanwhile, reconfiguring the parking lot further from the bluff failure plane is a logical interim step that will take pressure off the slumping bluff edge and set Beacon's up for potential future access improvements that do not require shoreline armoring. We supported parking lot reconfiguration in 2018, and we continue to support it today. The loss of 11 parking spaces is regrettable, but we ultimately agree with staff's findings that the loss is "minimal in light of the imminent health and safety concern."² That said, we would certainly support any designs that incorporate more parking if they do not rely on shoreline armoring. We also agree with resident suggestions and the Commissioners' addition to the project from the May 4 Planning Commission meeting to ensure that new bike stations are spaced to fit bikes with surfboard racks.

Thank you for the opportunity to comment. Attached below this letter is our recent letter of support to the Planning Commission, which we did not see in the public correspondence record. We love Beacon's Beach and will always support adaptable solutions that preserve public beach access while taking care to not compromise the beach itself.

Sincerely,

Mitch Silverstein
San Diego County Policy Coordinator
The Surfrider Foundation
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619.736.7757

Jim Jaffee and Kristin Brinner
Beach Preservation Committee Co-Leads
Surfrider Foundation San Diego County
beachpres@sandiego.surfrider.org

² Item 10a [Staff Report, p.10](#)

Support for Item 8A - Beacons Parking Lot Plan



Mitch Silverstein <msilverstein@sandiego.surfrider.org>

to dgay, Todd, Jim, Kristin ▾

Hi Deanna,

Please see attached letter from Surfrider Foundation San Diego County, in support of Item 8A - Beacons Parking Lot Plan. Thank you.

📧 Thu, May 4, 4:05 PM



Mitch Silverstein | San Diego County Policy Coordinator | The Surfrider Foundation | he/him/his
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May 4, 2023

Delivered via email

To: Deanna Gay dgay@encininitasca.gov
Planning Commission
City of Encinitas
505 South Vulcan Ave
Encinitas, CA 92024

Re: Agenda Item 8A Beacon's Beach Parking Lot Plan

Dear Deanna Gay and Planning Commissioners,

The Surfrider Foundation San Diego County Chapter recognizes beaches as a public resource held in the public trust. Beaches provide affordable recreational access available to everyone. As human activities and development in coastal areas increase, preservation of these areas becomes more important. Surfrider Foundation is an organization representing 250,000 surfers and beach-goers worldwide that value the protection and enjoyment of oceans, waves and beaches. For more than twenty years, the San Diego Chapter has reviewed and commented on shoreline management projects and policy in San Diego County. We appreciate the opportunity to provide comments to the city of Encinitas about these important issues.

Specifically, we have been providing comments on the Beacon's Bluff Stabilization for a quite some time, including providing comments on the original 2003 proposal to build a seawall, issuing a Policy Statement in July 2014 to reflect our priorities, attending various meetings with city staff and Councilmembers, submitting a letter concerning the Bluff Stabilization Preferred Alternative in March 2017, and receiving presentations from consultants in 2015 and 2017. We attended the July 2018 Planning Commission Hearing and subsequent community workshops, and supported the proposal to reconfigure the parking lot away from the bluff's edge, construct a new beach access stairway, and continue to maintain the existing switchback trail as long as feasible.

Despite the beach access stairway proposal's failure to move forward due to local opposition, we continue to support the plan to reconfigure the parking lot away from the bluff's edge. The erosion issues at Beacon's Beach present a delicate balance for our organization, weighing the need to protect public access as well as preserving coastal resources. Losing parking spaces is never an ideal situation, but neither would again losing access to the very beach we are trying to protect.

We agree that relocating the parking spots away from the bluff's edge is a public safety issue - the geotechnical reports state that the factor of safety is unacceptable. Speaking with locals about this issue, we have made the following analogy: The bluff and switchback trail are similar to a tower of Jenga blocks. The block tower can remain standing even if many of the supporting blocks have been removed. However, the Jenga tower is so unstable all it needs is a

very small disturbance in order to topple the entire thing. With the bluff underneath the parking lot having a Factor of Safety of near 1, the Jenga Tower is teetering.

We appreciate the city's proactive stance since mid 2017 to come up with a plan that complies with the Coastal Act and the Leucadia State Beach General Plan, which prohibits armor on the bluff. See page 14.

Bluff Fortification

Most of the cliff faces and clifftops adjacent to the state beach are privately owned. The clifftops are heavily developed with single-family dwellings, with lots extending down the bluffs to the unit boundary at the toe of the cliffs. The cliffs are being undercut at their bases by wave action and are being eroded by surface runoff. The cliffs will eventually retreat and in the process destroy the clifftop structures. Cliff failure may occur as a large-scale landslide as a result of inland irrigation and exposure to direct sea wave attack, or the failure may occur as very slow surface erosion and not result in any loss of structures for 50 years. Clifftop owners are attempting to slow the process of seacliff retreat by planting vegetation on the slopes and by fortifying the bluffs with retaining walls or gunite. Such actions are very expensive, are not permanent solutions, and destroy the scenic qualities of the bluffs.

Policy: The state-owned cliff faces at Leucadia State Beach shall not be fortified with retaining walls. Seacliff retreat is recognized as a natural process that cannot be permanently stopped. Erosion control should be limited to mitigating the detrimental effects of increased runoff from the clifftops and to planting native vegetation on the cliff faces. Seawalls shall not be constructed at the state beach.

To summarize, we support the city's plans to relocate and reconfigure the parking lot.

Sincerely,

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

Mitch Silverstein
Policy Coordinator
San Diego Chapter of the Surfrider Foundation