



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