



September 6, 2024

Delivered via email

Re: California Coastal Commission and Local Government Working Group Workshop

Honorable Commissioners,

Surfrider Foundation San Diego County signed onto the coalition letter expressing the concerns of both Surfrider and other organizations with the concept of “neighborhood-scale adaptation” planning. Please accept these additional comments from the perspective of our San Diego County Chapter.

We live in an era of accelerated rising seas and powerful coastal storm surges, yet we continue to fight (and often lose) against reckless development on top of our eroding bluffs and beaches. Our chapter has been an outspoken opponent of coastal armoring, and the continuing development patterns that necessitate it, for over 30 years. We have always relied on the Coastal Commission to uphold the Coastal Act, including the established interpretation that an existing structure is one that was built prior to the Coastal Act becoming effective in 1977.

But even with Coastal Act protections in place, the San Diego County coastline is being armored in front of both “existing structures” and new developments via emergency permits, LCP misinterpretations, and other loopholes that coastal property owners successfully push through local governments and the Commission time and time again. Emergency permitting allowed construction of a [100-foot seawall](#) at Terramar beach in 2008 to protect two homes built only four years prior, despite geotechnical reports that said the home’s 40-foot setback would guarantee safety for 75 years. And in Solana Beach, a home built in 1996 with a deed restriction against future shoreline protection was granted a [seawall permit in 2021](#) through clever legal machinations with neighboring property owners. The reality in San Diego County is that if you can afford to build a seawall, you’ll ultimately get one.

We appreciate the Commission’s dedication to preserving our coastline. But speaking frankly, we are losing the war to save San Diego County’s beaches. Our beaches, our coastal access, our surfing waves, and our coastal ecosystems are constantly being chipped away so that an entitled few can enjoy million-dollar views from properties that should have never been built so close to the beach. And while we’ve seen and

commented on many CDPs for both individual and “neighborhood-scale” armoring, we cannot recall a single San Diego Coast District CDP application from property owners, either individual or at a “neighborhood-scale,” that involved a non-armoring form of adaptation.

Therefore, it should not surprise you that our chapter reads “neighborhood-scale adaptation” and sees “neighborhood-scale seawalls.” We fear that for property owners who wield immense influence in the cities where they reside, “neighborhood-scale adaptation” is a way to more efficiently build seawalls that protect their properties while sacrificing continued coastal access for the rest of us. Armoring is currently the go-to solution for coastal property owners regardless of whether they come forward as individual owners or as part of a neighborhood. This paradigm needs to change, therefore we ask that the Commission ensure that the Local Government Workshop does not result in streamlining larger seawall projects under the guise of adaptation.

We should remind you that our chapter is pragmatic about armoring in circumstances that warrant it, consistent with the Coastal Act. We supported SANDAG’s Del Mar Bluffs Stabilization Project #5, despite hundreds of feet of seawalls, because the decision included a plan and timeframe for moving the railroad off Del Mar’s eroding bluffs and restoring the beach after-the-fact. Even though armoring was involved and the mitigation was inadequate, we agreed that it was an acceptable compromise because the LOSSAN corridor is critical infrastructure for which long-term adaptation was laid out in the plan.

Generally speaking, we support the other proposals in the Local Government Working Group. We’re supportive of phased LCP Updates and anything else that will deem real adaptation more efficient. We all know that LCPs from 30-40 years ago are no longer sufficient to deal with the rising seas we face. We wholeheartedly support “neighborhood-scale adaptation” if the adaptation in question actually protects coastal resources and the people who depend upon them. We support dune restoration, living shorelines, and relocation of threatened infrastructure because those strategies constitute true coastal adaptation.

Constructing a seawall is not real adaptation. Nor is placing hundreds of tons of boulders on the beach to protect a home that would otherwise be washed away, that someone willingly purchased knowing full well the risks involved. The only thing adaptive about these strategies is that the vast majority of us lose our beaches in order to adapt to the needs of a privileged few. As for mitigation, we cannot help assuming it would be wholly inadequate without seeing specific suggestions or policies. Does adequate mitigation even exist for walling off our beaches at a neighborhood-scale in San Diego County, where the coastline is fully developed? What good is a required beach access stairway if no beach remains to access?

The Commission has talked a lot about environmental justice these last few years. Allowing the continued destruction of public beaches to serve the interests of an elite minority is one of, if not the most, pervasive environmental injustices occurring under the Commission's purview. Therefore, we are gravely concerned that the Commission might allow for larger armoring projects than what we currently suffer in San Diego County.

In conclusion, the San Diego County Chapter calls on the Commission to firmly reject any proposal that allows for streamlined neighborhood-scale armoring in our district. Meanwhile, we support any good-faith effort to streamline neighborhood-scale adaptation that actually benefits our beaches and the millions of people who rely on them for both recreation and their livelihood.

Sincerely,

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