



December 6, 2024

Delivered via email

To: Karl Schwing
District Director, San Diego Coast
California Coastal Commission

Re: Th22a - Permit Amendment No. 6-20-0240-A1 (Channelside Water Resources LP, Carlsbad)

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 dispute resolution hearing. We generally support Staff's recommendation. However, we would like to propose strengthening Special Condition #11: Surf Monitoring Plan.

First, we'd like to commend Staff for producing very thoughtful and comprehensive Special Conditions to mitigate any potential negative impacts for the proposed additional dredge cycles. We especially appreciate the inclusion of a surf monitoring plan. To ensure that adequate surf monitoring occurs, we ask that the applicant be required to monitor the entire beach replenishment area, not just North Beach.

While Tamarack State Beach (south end of North Beach) is likely the most popular surf spot in the replenishment area, popular surf breaks do exist at both Middle & South Beach. There is consistent surf at the north ends of both Middle Beach (south of the north jetty) and South Beach ("warm waters"), along with surfable waves across much of South Beach. On any given day, we would wager that you'll see just as many surfers from Middle Beach north jetty to the southern end of South Beach as at North Beach.



“Warm Waters Surfing Area” (South Beach) shows up on Google Maps, a testament to its popularity for surfing

At the very least, the north jetty at Middle Beach and South Beach areas should be included. Almost as much sand will be deposited along Middle Beach as North Beach (150,000 cy vs. 137,000 cy), and the north jetty is a popular surf spot. South Beach is also a popular surfing area.

Increasing the level of required surf monitoring will ensure that impacts to surfing - whether positive, negative, or both - will be recorded and better understood in the future.

Lastly, we also appreciate Staff’s thoughtful recommendation to include visible signage regarding the project’s potential impacts to surfing during the entire surf monitoring phase, along with a questionnaire for surfers to contribute their experiences to the surf monitoring data. We request that this signage be upsized to 18” x 24” rather than the proposed 8” x 12”, which is the size of a standard sheet of paper and could be easily overlooked by local surfers. As we’re requesting surf monitoring across the entire beach fill area, we also request that the larger signage be posted at or adjacent to all 3 beaches: at or near Tamarack at North Beach, at or near the jetty at Middle Beach, and at or near Warm Waters at South Beach.

Thank you for the opportunity to comment on this permit amendment.

Sincerely,

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