



March 8, 2024

Delivered via email

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

Re: Th 17a - Permit No. 6-22-0959-A1 (Loews Coronado Bay Resort and California State Parks, Coronado)

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 permit amendment. While we neither strongly support or oppose the concession stand at Silver Strand State Beach, we share staff's concerns about public access and do have some additional concerns and questions about the operation.

Surfrider shares staff's primary concern about public access, and appreciates the entire suite of special conditions in the permit to ensure that the concession stand, *and especially the area they've been allotted to set up beach chairs and umbrellas for hotel guests and the public*, does not create the perception of a private beach area. Given the permittees' failure to adhere to the permit conditions in the past, we also agree that a one year permit is a more prudent decision than the requested 3-year permit extension. If the applicant cannot adhere to their permit conditions this summer, then Surfrider will ask that future CDPs be denied. The special conditions are simple and must be upheld to ensure that the entirety of Silver Strand State Beach is and appears to be publicly accessible.

We also appreciate the condition to prohibit the concessionaire from selling single-use plastic items to beachgoers. The San Diego County Chapter conducts over 100 beach cleanups every year at beaches across San Diego County; year after year, single-use plastics dominate what we remove from our beaches. 83% of the 260,000 items collected by our volunteers in 2023 were made from plastic, the vast majority consisting of single-use plastic items or fragments. Any business operating on public lands should have strong restrictions on selling the very items that consistently trash

our environment and harm wildlife. The beach is a special place, so special rules *must* apply. Thank you for taking an assertive approach to regulating single-use plastic pollution in CDP applications.

We do have a question (and potential concern) about the agreement between Loews Coronado Bay Resort and State Parks to operate this concession stand. It is our understanding that while members of the public can rent beach chairs and umbrellas for \$8 each or \$10 a pair, the amenities are provided at no charge to hotel guests. We are curious if, and how much, Loews Coronado pays CA State Parks for the privilege of operating a concession stand on a State Beach. Given that members of the public must pay between \$12-20 to park at Silver Strand ([according to CA State Parks site](#)), we expect that Loews Coronado is required to compensate State Parks in some way, shape, or form in exchange for taking up public space on both the parking lot and the beach. While this may seem peripheral to the CDP, we would like to know the details of the concession stand agreement to ensure that A) State Parks is properly compensated, and B) that a large, for-profit hotel is not getting a better deal for taking up beach space than the general public.

We are also under the impression that State Parks is a co-applicant with Loews Coronado. Assuming the concession stand employees work for Loews and not State Parks, we would like to see something in writing that requires State Parks employees/lifeguards to enforce the permit conditions. Considering the permit conditions have been disregarded in the past and that the concession stand is adjacent to the CA State Parks offices, it would be prudent to ensure that local State Parks officers are well-versed in the permit conditions and required to enforce them.

Thank you for the opportunity to comment.

Sincerely,

Mitch Silverstein
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