



March 24, 2025

Delivered via Email

Oceanside Planning Commission
300 N Coast Hwy
Oceanside, CA 92054

Re: Item 5 of the March 24, 2025 Planning Commission Meeting - Consideration of a REGULAR COASTAL PERMIT (RC24-00005) for the remodel of an existing single-family residence to include interior remodel, exterior material updates, addition of 2 dormers, window relocation, garage and driveway expansion, and repair of exterior balconies at the property located at 1121 S. Pacific Street in the Townsite Oceanside Neighborhood Planning Area and the appealable area of the Coastal Zone. The project site is designated (C-RMHT) Mixed High Density and Transient Residential by the City's Local Coastal Program Land Use Plan, and is zoned RT (Residential Tourist – Coastal) per the City's Zoning Ordinance. 1121 SOUTH PACIFIC STREET – APPLICANT: OBH LLC

Honorable Commission Members & Staff Liaison(s),

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. Surfrider's San Diego County Chapter (Surfrider) 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. Please accept these comments re: the project in front of you at 1121 S Pacific St.

Surfrider is concerned with private development and armoring along S Pacific St. across Oceanside's historic back beach, west of the coastal bluffs, because it has vastly diminished public beach space and exacerbates beach erosion that has reached emergency levels. This particular home enjoys a 70' long backyard with a perched, private beach that is reliant on a hazardous boulder revetment that steals any remaining beach from the public. This is an unjust situation that begs for remediation and/or mitigation, and both the Coastal Act requires such



mitigation for existing structures if and when they redevelop enough to be considered new development.

Surfrider asks that both the Planning Commission and the public receive a report on the entire permit history of redevelopment at 1121 S Pacific St. before any additional redevelopment is approved. The Coastal Commission interprets any existing structure that exceeds cumulative redevelopment of 50% or over to be considered a new development. The associated staff report on this item does not reference any previous redevelopment at this property, nor does it state whether any such redevelopment has been tracked. A host of LCP requirements come into play if and when 1121 S Pacific St. crosses the 50% redevelopment threshold, including but not limited to:

- Mitigation for adverse impacts to sand supply from the bluff, which absent development, would otherwise naturally replenish the beach
- Removal or relocation of the revetment protecting this property, which is currently situated on public tidelands and blocks lateral beach access

From Oceanside's LCP:

6. Revetments...seawalls...cliff retaining walls, and other such construction (i.e. a home built atop the beach and west of the coastal bluff) that alters natural shoreline process shall be permitted when required to serve coastal-dependent uses or to protect existing structures... in danger of erosion, and when designed to eliminate or mitigate impacts on local shoreline sand supply. Such structures shall be designed and constructed... to minimize encroachment on the beach. Such structures shall not interfere with access along the beach. (paraphrased, emphasis and notes in parentheses added) ¹

11. New development along the City's coastal bluffs and hillsides should assure stability and protection of natural landforms, and neither create nor contribute significantly to erosion or geologic instability, or in any way require the construction of protective devices that would substantially alter natural landforms.²

¹ Page 20, Local Coastal Program summary of findings and policies, 1985

² Page 22, Local Coastal Program summary of findings and policies, 1985



In conclusion, we ask that the full permit history for this property be reviewed so that a conclusion can be made on whether or not it must be considered a new development, which would require additional considerations to protect the coastal resources and public access that this property is impacting.

Thank you for the opportunity to comment.

Mitch Silverstein
San Diego County Policy Coordinator
Surfrider Foundation
msilverstein@sandiego.surfrider.org
619.736.7757

Kristin Brinner and Jim Jaffee
Beach Preservation Committee Co-Leads
beachpres@sandiego.surfrider.org