



October 3, 2024

Delivered via email

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

Re: W16a - Application 6-23-0538 (California Dept. of Parks and Recreation San Elijo State Beach revetment, Encinitas)

Honorable Commissioners,

The Surfrider Foundation is a nonprofit grassroots organization dedicated to the protection and enjoyment of our world's ocean, waves, and beaches, for all people, through a powerful network. Thank you for the opportunity to comment on this project.

We support the Special Conditions recommended by staff, especially Special Condition #1, which requires State Parks to return in 5 years with a long-term hazards management plan that includes alternatives that reduce impacts to sand supply, public access, recreation, and relevant coastal resources at this site. While State Parks may decide to apply for a 5-year extension for this revetment augmentation, both the Commission and the beachgoing public deserve a full reckoning of potential alternatives to continued reliance on shoreline protective devices that negatively impact our beaches. .

Surfrider is highly supportive of maximum coastal access, including the low-cost coastal overnight accommodations that the San Elijo State Beach campground affords the public. However, we also maintain that a "reality check" on the future viability of the campground that includes a balanced adaptation approach, is overdue. Several campsites have already been lost due to bluff erosion, and as much as it pains us to say so, more will be lost in the future. We believe a balanced approach must be considered that takes into account the importance of each campsite, but also considers the importance of preserving the beach itself, which serves the general public in addition to campground guests.

For example, the Staff Report mentions that if the southern roundabout were lost, the

State Parks Fire Marshall would order the closure of the 14 southernmost campsites due to lack of emergency vehicle access. Surfrider politely challenges this assertion to justify continued armoring, because there is clearly space to move or redesign the roundabout in a way that would result in the loss of significantly less campsites. Realignment of the roundabout in a way that sacrifices only a few campsites, but is less reliant on armoring, may be a more sustainable interim solution than a continued escalation of boulders placed on valuable public beach space. We wonder if either the Commission or State Parks has a formula to put a value on beach space vs. low-cost overnight accommodations. One thing we all know for sure is that if the beach continues to be armored, everyone loses in the end.

Thank you for the opportunity to comment on this project. We look forward to State Parks long-term hazards management plan, and hope it includes a balanced approach that evaluates the importance of preserving San Elijo State Beach in addition to the campground.

Sincerely,

Mitch Silverstein
Policy Manager
San Diego County Chapter, Surfrider Foundation

Kristin Brinner & Jim Jaffee
Residents of Solana Beach
Co-Leads of the Beach Preservation Committee
San Diego County Chapter, Surfrider Foundation