

**CALIFORNIA COASTAL COMMISSION**

South Coast District Office  
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**F11b**

**5-19-0345-A1 (OC Parks, Capistrano Beach)**

**November 19, 2021**

**CORRESPONDENCE**



November 12, 2021

To: Stephen Padilla, Chair, California Coastal Commission

CC: John Ainsworth, Executive Director, California Coastal Commission  
Dani Ziff, Coastal Program Analyst, California Coastal Commission

**Re: Item F11b, Coastal Development Permit Amendment No, 5-19-0345-A1  
– Orange County Parks Capistrano Beach County Park**

Dear Chair Padilla,

The Surfrider Foundation (Surfrider) is a nonprofit grassroots organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches, for all people, through a powerful activist network. Our South Orange County chapter has been working to protect Capistrano County Beach's public bluffs and beach for many years and objects to the continued revetment installation at Capistrano Beach. Moving forward, a long-term plan that includes managed retreat is the only safe and viable option to ensure the protection of Capistrano Beach as well as its uses and amenities.

Surfrider is not concerned with OC Parks' application for a temporary 4 month extension of their coastal development permit to remove damaged or imminently threatened public park amenities. However, there can be no further prolonged delays to addressing the severe erosion issues at Capistrano Beach. Surfrider urges the Commission to direct the County to use this extension time to develop a long-term managed retreat and living shoreline management program, which should include:

- Removal of sandbags that are degrading and polluting the beach;
- Managed retreat of the parking lot and removal of the currently existing seawalls, with allowances for ADA parking and access;
- A robust living shoreline project that is connected to the Doheny State Beach living shoreline;
- A full managed retreat and living shoreline project plan for the entire site upon the success of the pilot project; and



- A full and detailed financing plan for the pilot project and long-term managed retreat plan in the Coastal Development Permit application.

### **Capistrano Beach Park Has Been Vulnerable Since the 1960's**

As we have described in previous correspondence to the Coastal Commission, storms have regularly caused significant damage to structures on Capistrano Beach since the early 1960's. This trend has worsened over the past decade due to climate change, and today the beach is more vulnerable than it has ever been to wave run-up, flooding, and erosion. This is an abridged timeline of storm events and their impacts on Capistrano County Beach:

- 1961: A storm resulted in significant damage to the Capistrano Beach Club, prompting extensive renovations in 1962.
- 1963: Severe storms breached the existing seawall and resulted in a new sea wall being erected in 1965.
- 1965: A storm caused the destruction of the 1,200 foot beach pier.
- 1969: El Nino storm flooded Capistrano Beach and forced schools to close for a week. The Capistrano Beach Club was demolished this same year due to extensive neglect and historical storm damage.
- 1979: County of Orange bought the property and re-opened Capistrano Beach Park to the public in 1980.
- 2015-2016: El Niño events caused record high tides and extreme waves that resulted in significant erosion on both ends of Capistrano Beach, severely damaging both the parking lot and sidewalk.
- 2018: A large storm and high tides caused the basketball court and boardwalk to buckle, resulting in their demolition.
- 2019: Shoreline erosion and wave run-up damaged the storm drain outfall at Capistrano Beach so badly that 150 feet of sandbags had to be put into place to protect the stormwater treatment system.



- 2020: High tide event on July 4th resulted in waves completely overtaking the shoreline and overflowing throughout the parking lot, resulting in a police emergency evacuation. This storm surge destroyed the sandbags that had been put in place the previous year, caused additional damage to the already crumbling sidewalks and pavement of the lot, badly damaged the existing seawall, and almost brought down the Coast Trail pathway.

Storm surges, El Niño events, high-tides, and waves will continue to pound the infrastructure at Capistrano Beach. It is now common to see parts of the beach closed off due to safety concerns.

The City cannot afford to sink more funding into short-term solutions for an area that has existed in harm's way for decades. Given our extensive understanding of the vulnerabilities of this area, the time for permanent solutions that include relocation is now. OC Parks needs to budget and prioritize rehabilitation of Capistrano Beach in the 2022 fiscal year, and should not be allowed to rely on the excuse that collaboration with the State Parks department warrants delayed implementation.

### **The Nature-Based Pilot Feasibility Study is Insufficient**

In December 2020, the Coastal Commission approved a coastal development permit (5-19-0345) for removal of "damaged or imminently threatened public park amenities." As a condition, OC Parks was required to demonstrate plans for longer term solutions for the area by conducting a feasibility study for a nature-based adaptation pilot project in the area. OC Parks was also required to submit a report on the status of OC Park's Capistrano Beach Master Plan.

In 2021 the Commission determined that the resulting application (permit application 5-19-0345) was incomplete. The application lacked analysis in several key areas, including: 1) lack of a detailed funding estimate or review for rehabilitation of Capistrano Beach, 2) lack of an impact analysis considering the continued use of revetments, 3) a missing public access report and 4) lack of supporting materials.



Surfrider notes a number of additional insufficiencies, including that the application does not include important parameters such as the inevitable need to excavate rubbish and toxins, and the dismissal of beach monitoring forms that point to sand cubes becoming plastic waste. The application was also based on public outreach that does not address the perspectives of low income communities of color that live outside of the 10-mile radius to which OC Parks limited their survey.

It is our significant concern that the project also fails to adequately address the feasibility of other project alternatives. The final Nature-Based Pilot Project Study Report only evaluates three options for a pilot project:

- Partial southern parking lot retreat with buried cobble berm and vegetated dune;
- Full parking lot retreat with buried cobble and vegetated dune; or
- Only North parking lot to Doheny State Beach retreat with buried cobble and vegetated dune.

Due to this extremely limited scope, the analysis not only fails to support a successful pilot project but does not provide a foundation for a more complete living shoreline project that would address the entirety of the beach.

### **Comprehensive Solution Needed Now**

Surfrider supports a full living shoreline and plans for complete managed retreat projects to be implemented as soon as possible given the state of erosion at Capistrano Beach. Unfortunately, the work done by the City to study possible alternatives for this area have not been sufficient. Surfrider is not opposed to a South Reach project, but we cannot support one at this time due to the incompleteness of the feasibility analysis.

We urge Commissioners and staff to take this time extension to remedy the nature-based pilot study in a way that also supports a comprehensive long-term plan for managed



retreat. Vulnerabilities at Capistrano County Beach are only getting worse and the County must consider realistic options for preserving this beach.

Thank you,

Mandy Sackett  
California Policy Coordinator  
Surfrider Foundation

Denise Erkeneff  
Chapter Coordinator  
Surfrider Foundation  
South Orange County Chapter