

CALIFORNIA COASTAL COMMISSION

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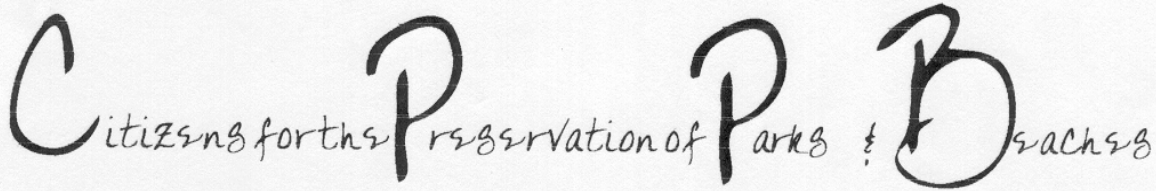


W15a

A-6-OCN-19-0181 (Beach Walk, Beach City LLCs)

March 10, 2021

CORRESPONDENCE



March 3, 2021

Delivered via email

TO: Toni Ross, California Coastal Commission

RE: Appeal Number A-6-OCN-19-0181
Beach Walk, Beach City LLC's
831 & 833 S. Pacific Street, Oceanside

Thank you for the opportunity to file the appeal on this project. We truly appreciate all the hard work that staff has put into working with the applicant to revise the project. With Sea Level Rise being an important part of the determination, we concur with The Surfrider Foundation findings. The rock revetment throughout most of our Oceanside coastline is a major contributor to the loss of our sandy beach.

We sincerely hope that the Coastal Commission will take a good look at the findings provided by Surfrider and proceed in a manner that guarantees access to our shoreline for many more years to come.

Thank You,
Carolyn Krammer & Shari Mackin
Citizens for the Preservation of Parks & Beaches
904 Leonard Avenue, Oceanside, CA. 92054



March 3, 2021

Delivered via email

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

Re: Item W15a, Appeal Number A-6-OCN-19-0181, Applicant: Beach Walk

Dear Chair Padilla and District Director Schwing,

The San Diego Chapter of the Surfrider Foundation was listed as a party of interest on the appeal from coastal permit decision of local government filed by Carolyn Krammer (appellant) concerning the decision by the city of Oceanside to approve the demolition of an existing nine unit complex to enable the construction of a four-unit condo development. We commend Coastal Commission staff for working with the applicant to revise the project to address many of the concerns Ms. Krammer raised in her appeal. However we object to the determination that the proposed development will be safe through the expected economic life of the structure. This safety determination depended on the presence of a existing rock revetment on City property seaward of the proposed development:

"...the wave runup study completed for the development concluded that the site will be safe only because it will be adequately protected by the offsite, City maintained rock revetment. The Commission's engineer has reviewed the material submitted by the applicant and concurs that the site will be safe due to the existing revetment." (staff report page 34, emphasis added)¹

Approving new development that relies on coastal armoring violates the 2018 Sea Level Rise Guidance adopted by the Commission:

" MAXIMIZE PROTECTION OF PUBLIC ACCESS, RECREATION, AND SENSITIVE COASTAL RESOURCES [Coastal Act Chapter 3 policies]...

¹ Staff report:

<https://documents.coastal.ca.gov/reports/2021/3/W15a/W15a-3-2021-report.pdf>

12. Maximize natural shoreline values and processes; avoid expansion and minimize the perpetuation of shoreline armoring....Major renovations, redevelopment, or other new development should not rely upon existing shore protective devices for site stability or hazard protection. Where feasible, existing shoreline protection that is no longer being relied upon in this way, or no longer needed otherwise, should be phased out.”² (2018 Sea Level Rise Guidance page 40, emphasis added)

The staff report also points out that the City’s LCP contains conflicting policies regarding the construction of new development that relies on shoreline protective devices. While the City’s Land Use Plan only allows protection for existing development, the City’s Seawall Ordinance allows shoreline structures to protect proposed or existing structures. The Ordinance reads:

*“Shoreline structures as defined in Article II shall be allowed when required to serve coastal dependent uses or to protect proposed or existing structures in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply and other coastal resources; and **where the construction is in conformance with the City’s Local Coastal Plan.**” (staff report page 34-35, emphasis added)*

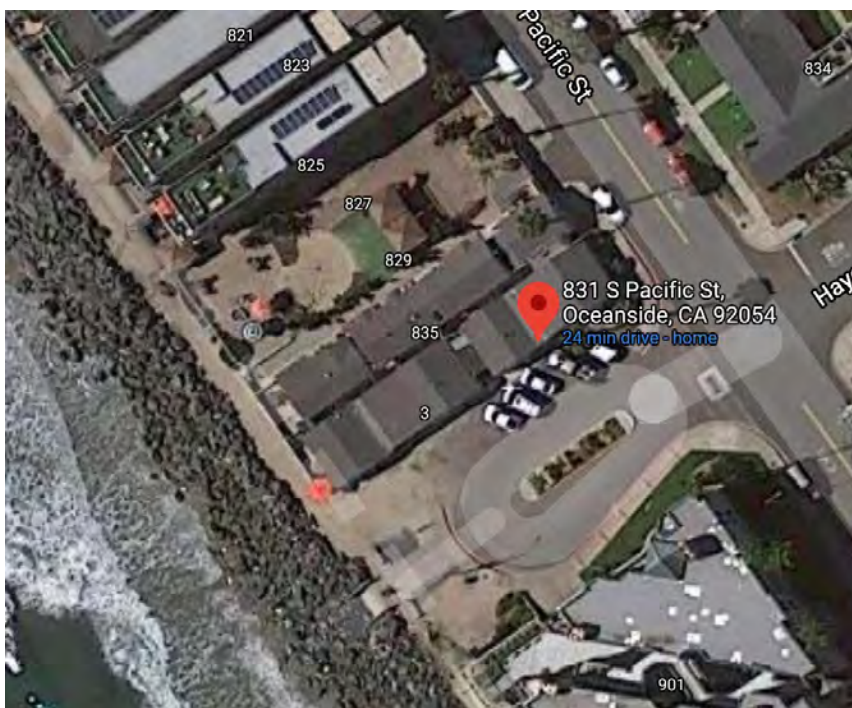
The staff report also states:

“Additionally, if, in the future, maintenance work is proposed for the revetment by the City, public access and recreation impacts will be reviewed and mitigated if needed at that time.” (staff report page 35)

The proposed development can only be deemed acceptable when the impacts of the existing revetment are better understood. An analysis of wave runup absent a revetment is needed to show that the proposed development can withstand wave conditions if the revetment is not perpetuated. Without this it will not be possible to determine if the proposed development is in conformance with the LCP, or to determine the impacts of the proposed development on sand supply and other coastal resources, as required by the City’s Seawall Ordinance. Given the Seawall Ordinance’s guidance on determining impacts, and the Commission’s 2018 Adopted SLR Guidance directive that new development not rely on shoreline protection, an impact analysis must be performed before approval of any permits. The analysis may show the need for additional conditions or mitigation measures. As such approval of this permit is premature.

² 2018 ADOPTED CALIFORNIA COASTAL COMMISSION SEA LEVEL RISE POLICY GUIDANCE (SLR Guidance) : https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf

From aerial photos of the subject site, the rock revetment is much wider than the dirt path open for public pedestrian use as well as wider than the sandy beach below. It seems plausible that the city may want to remove the revetment in the future in order to provide more beach space, which is currently not available in much of Oceanside due to a lack of sand and presence of wide rocky structures such as this. The staff report states the revetment is necessary to protect the access path, but absent the revetment there may be improved access. However, since no impact analysis of the revetment has been performed, it's not possible to know.



Google Earth, Imagery Captured in 2021

We therefore request that the Coastal Commission ask the applicant to provide a wave runup analysis without the revetment to determine if the proposed development would be safe for the economic life of the structure. Without this determination, the Coastal Commission should not vote to approve the requested Coastal Development Permit.

Sincerely,

Kristin Brinner & Jim Jaffee
Co-leads, Beach Preservation Committee
San Diego Chapter, Surfrider Foundation

Laura Walsh
Policy Coordinator
San Diego Chapter, Surfrider Foundation

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