

CALIFORNIA COASTAL COMMISSION

SAN DIEGO DISTRICT OFFICE
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SAN DIEGO, CA 92108-4402
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F11c

6-22-0113 (City of San Diego Point La Jolla Seasonal Closure)

April 8, 2022

CORRESPONDENCE #2

Parks and Recreation Department

Administrative Services Division

April 1, 2022

Ms. Kaitlin Carney
Coastal Planner
California Coastal Commission
San Diego Coast District
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

Via email: kaitlin.carney@coastal.ca.gov

Dear Ms. Carney:

Thank you for the California Coastal Commission's ("Commission") Staff Report on the City of San Diego's ("City") proposal for a seasonal closure of Point La Jolla bluffs during California sea lion pupping season (Application No.: 6-22-0113). The City of San Diego is grateful for the Commission's review and consideration of its coastal development plan (CDP) application, as well as the "Approval with Conditions" recommendation made by Staff.

The City has carefully considered the five Special Conditions noted in the Staff Report. Please see below for our response to the points made therein.

Special Condition No. 1:

Requires the City to revise the seasonal closure to extend from May 1 to October 31

Response:

The City accepts the modification of the closure dates of May 1st through October 31st.

Special Condition No. 2

Limits the permit terms to seven (7) years and requires the City to apply for an amendment of new coastal development permit to continue authorization of the public access restrictions

Response:

The City accepts the permit duration of seven years.

Special Condition No. 3

Requires the City to prepare and submit a monitoring plan/reports (by January 1st of each year) which assesses the following:

- a. the level of use by sea lions of the haul-out site at Point La Jolla; and
- b. the effectiveness of the seasonal closure at eliminating harassment of hauled-out sea lions

Response:

The City requests to revise the deadline to submit the Monitoring Plan to the Executive Director by January 1, 2023 to September 30, 2023 in order to collect as much monitoring data during the seasonal closure.

Special Condition No. 4

Requires the City to submit a long-term management plan for Point La Jolla by November 1, 2022 that includes strategies to reduce harassment outside of the pupping season while maximizing public access

Response:

The City requests to revise the deadline to submit the Long-Term Management Plan prior to April 1, 2023, instead of November 1, 2022, to collect important data during the non-closure period to understand if the initial approaches are working or not. The City would like to assess actions implemented outside of the seasonal closure period.

Special Condition No. 5

Requires the City to submit a final signage plan consistent with the one submitted with the Application and includes signs for posting both during, and outside of, the season closure

Response:

The City would like to propose instead a similar sign as posted at the Children's Pool.

The sign will say the following (in large font):

- **AREA CLOSED**

Beneath "AREA CLOSED", text in smaller font in caps will follow:

- **NO ACCESS ALLOWED DURING** (next line)
- **CA SEA LION PUPPING SEASON** (next line)
- **May 1st to October 31st**

For other matters not covered by the Special Conditions listed above, but requested of the City for consideration, the City notes the following:

Beach Wooden Access Staircase

- The City has reevaluated the staircase and would like to process the after-the-fact authorization for the wooden staircase with the consolidated CDP.

Closure of La Jolla Cove

- The City does not support a closure of La Jolla Cove.

Parks and Recreation Department

Administrative Services Division

Thank you again for your recommendations and the opportunity to provide a response to the Staff Report. We look forward to discussing our project in more detail on Friday, April 8, 2022.

Sincerely,



Karen Dennison
Assistant Director

cc: Councilmember Joe LaCava, District 1
Matthew Yagyagan, Deputy Director of Policy, Office of the Mayor
Randy Wilde, Senior Policy Advisor, Office of the Mayor
Matthew Griffith, Community Representative Office of the Mayor
Kristina Peralta, Deputy Chief Operating Officer, Neighborhood Services
Andy Field, Department Director, Parks and Recreation Department
Chief James Gartland, Lifeguard Chief, San Diego Fire-Rescue
Michael Tully, Deputy Director, Parks and Recreation Department



SIERRA CLUB

SAN DIEGO CHAPTER



SEAL SOCIETY

April 1, 2022

Via email

Reference: F-11-c PERMIT NUMBER 6-22-0113

APPLICANT(S) City of San Diego, Parks & Recreation:

PROJECT DESCRIPTION: Application of City of San Diego Parks and Recreation to temporarily close public access to Point La Jolla

PROJECT LOCATION: La Jolla, San Diego, San Diego County.

Dear Commissioners,

Sierra Club San Diego and Seal Society commend the California Coastal Commission staff for their thorough investigation into the sea lion rookery in La Jolla. This is a unique and sensitive habitat for sea lions, the only rookery on the California coastline. We thank Commission staff for their careful review of the science and facts, and we agree with their recommendations. Especially important is the longer closure period to ensure that pups are protected while they are at their most vulnerable and to ensure that the public is able to safely view and enhance their experience from the paved walking path.

However, we strongly oppose the closure boundaries described in the CDP application as this results in a large area of ocean access that will lead to confusion and disturbances to resting and nursing sea lions and possible abuse. The CDP submitted by the City plans to create three separate areas with different rules during the closure season:

- Point La Jolla: closed to all
- Large part of Boomer Beach: open for ocean access
- Southern portion of Boomer Beach: open to the public.

As can be seen in the photo below, all of Boomer Beach is used by sea lions to haul out and pup counts have shown that 40% of births occur on the beach. In addition, territorial bulls fight from the water's edge to the wall. The closure boundary proposed by the CDP will leave half of the sea lion rookery open to disturbance and therefore this will not achieve the "clear and enforceable line between public access restrictions and sea lion protection at Point La Jolla" as recommended by staff in their report. It should also be noted that all 17 other seal rookeries in California are closed to the public during pupping season and they have no allowance for ocean access during this period including the Children's Pool during Harbor Seal pupping season.

8304 Clairemont Mesa Blvd., Ste 101 • San Diego, CA. 92111

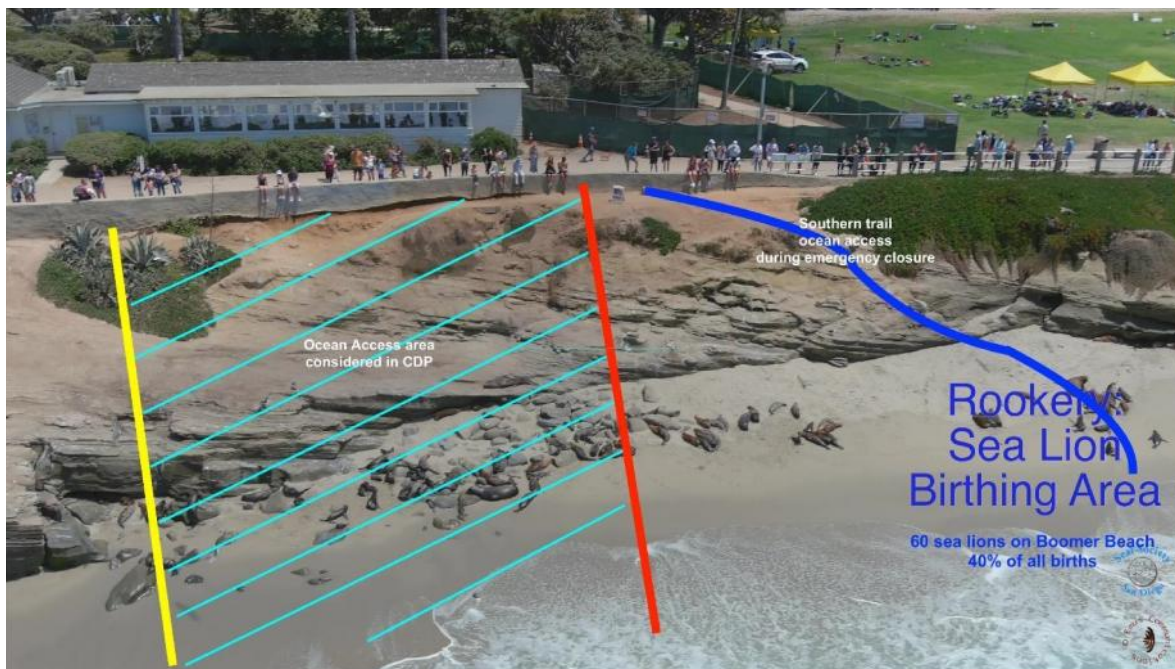
TEL: 858-569-6005

<http://sandigosierraclub.org>

Point La Jolla



This boundary, shown in red below, was effective in summer 2021 in eliminating or significantly reducing sea lion harassment and keeping the public safe. This boundary already allowed for ocean access via a trail south of the closure area, shown in blue below, which was described by the Chief Lifeguard as the “safest route to enter the ocean”. This trail access meets the requirement of the California Coastal Act to protect marine resources while balancing beach access.



Sierra Club opposes the creation of the large ocean access shown in the photo above between the yellow and red lines for the following reasons:

- having three different areas with different rules makes this closure more difficult to manage by rangers who do not have authority to enforce the Marine Mammal Protection Act to keep people at safe distances while they access the area.
- creates a new ocean access point and path where none exists and does not conform to the La Jolla Coastal Plan that limits access to designated trails.
- adding a swimming sign at the entrance to the ocean access area is dangerous as it will encourage the public to use the beach for swimming when Boomer Beach has dangerous rip currents evidenced by the warning sign which will be too far away for the public to view it properly.
- access through this area is vulnerable to abuse as people are eager to get close to the wild sea lions as they are attracted by the opportunity to take numerous selfies they see on social media.
- it is very dangerous for any humans to transit through a breeding area: large bulls weighing 800 - 900 lbs. defend their territories and if visitors get close to them, they may lunge, chase, and bite them. Mothers may nip if people get close to their pups.
- sea lion pups are very vulnerable to being disturbed by those accessing the ocean in their first few months of life. Moms nurse their pups for 11 months; pups begin to forage for food themselves around 6 months but are not adept until 8 months (Sharon Melin, NOAA Technical Paper 2017). Pups are vulnerable to drowning in rough surf until 3 - 4 months. Sea lion pups are left vulnerable on land while their moms forage when people often try to pet them.
- there is evidence that some spear fishermen disturb and even harass sea lions while accessing the ocean, some being very opposed to any closure.
- there is a historical trail for ocean access that was used in the previous emergency closure last summer which is sufficient to allow for the access of spear fishermen and body surfers. The actual number of users is quite small and therefore the number of people inconvenienced is small and does not warrant the creation of such a wide area for access.

We strongly believe that having such a large ocean access area negates the purpose and intent of the closure.

Ocean Access does not eliminate harassment

Spear fishermen are not always mindful of the disturbance they can cause sea lions and there is a risk that the public will seek to access the ocean to get close to sea lions with large bulls, moms and pups as documented.



City's Proposed Map as submitted to the Coastal Commission cuts through the Rookery.



Cliffs above Boomer Beach. Sea lions use this area to get to higher ground during high tide to rest or nurse. Pups are left on cliffs while moms go out foraging from 1-3 days at a time. Pups fast during this time.



Sea Lion pups getting to high ground and in the city proposed "ocean access" area.

Recommended Action with our requested addition in red:

III. SPECIAL CONDITIONS

1. Revised Final Plans. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and written approval of the Executive Director, final site plans for the proposed development. Said plans shall be in substantial conformance with the plans submitted by the City of San Diego on March 18, 2022, except that they shall be revised to reflect the following:

(a) The seasonal closure shall extend from May 1 through October 31 of each year.

(b) The seasonal closure shall include all of the area closed under the City of San Diego Emergency CDP #695848.

The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations

Recommended Motion:

"I move that special condition 1 be amended to add a second revision as:

(b) The seasonal closure shall include all of the area closed under the City of San Diego Emergency CDP #695848.

and ask for a Yes vote"

Thank you for considering our request and the opportunity to comment on this important matter.

Richard Miller
Chapter Director

Robyn Davidoff
Chair, Seal Society

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

March 31, 2022

California Coastal Commission
San Diego Coast
7575 Metropolitan Drive #103,
San Diego, CA 92108

RE: Application No. 6-22-0113 (San Diego Point La Jolla seasonal closure, San Diego)

Honorable Coastal Commissioners and Alternates,

San Diego Audubon Society (SDAS) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. Our work has included invasive removal and revegetation events, training community scientists, advocating for developments and park management, educating school children about the importance of natural habitats, and many other projects. Over the years we have engaged with thousands of volunteers in carrying out these goals. We are writing out concern for the pupping Sea Lion at Boomer Beach and request that the area be closed for the following reasons:

Boomer Beach should be closed during breeding as a safety measure to protect the general public as it is dangerous for humans to be in a breeding area near the Sea Lions. The terrain in this area is uneven and slippery with rocks, bluffs and large crevices and people fall frequently in this area, especially in the birthing area. As large bulls that are 800 - 900 lbs will defend their territories, if the public gets too close, the bulls may lunge, chase, and bite them. Additionally, mothers may nip if people get close to their pups.

Sea lion pups are vulnerable to disturbance in their first few months of life and as Boomer Beach is where 40% of the births take place and pups learn to swim, this area should be closed off to the public at this time. Although the mothers nurse pups for the duration of 11 months and pups begin to forage for food themselves around 6 months, pups are not adept until 8 months (Sharon Melin, NOAA). Until pups are 3-4 months, they are vulnerable to drowning in rough surf and while mothers forage and when pups are left on the beach, they are vulnerable to the general public as people try to pet them.

The public has demonstrated that access to this area during pupping, is vulnerable to abuse as evidenced on social media. With evidence of the numerous selfies on social media in proximity to Sea Lions in this area in the past, open access to this area creates a danger to the general public as they may feel a false sense of security approaching the Sea Lions to take photographs. Additionally, photographs of people in this area taken close to Sea Lions may attract more people to copy this behavior.

The large ocean access area negates the purpose and intent of the closure and will be difficult to enforce by rangers. The existing trail for ocean access that was used in the previous emergency closure last summer is sufficient for the few spear-fishermen and body surfers that use this area. Overall, the foot-traffic data in the area recorded by the Seal Society, shows that the impact on the general public is small with only a few users every weekend. If this area was open, it would be difficult for park rangers to manage and police the area.

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

In summary, for the safety of the breeding Sea Lions and the general public, we support the guidance and recommendations provided by the California Coastal Commission and the Seal Society to close off Boomer Beach for the duration of Sea Lion breeding in accordance with last year's closure, as this was successful in creating a safe buffer between people and Sea Lions. Additionally, as Sea Lion breeding occurs annually, the closure of Boomer Beach during Sea Lion breeding should be an annual occurrence. We hope that the City of San Diego will take appropriate measures towards protecting the marine wildlife and the general public during this sensitive time for the Sea Lions. Thank you for your time and consideration.

Sincerely,

Lesley Handa
Handa Ornithology Lab
San Diego Audubon Society Conservation Committee
San Diego Audubon Society Board



Sage Wildlife Biology

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March 31, 2022

To: CALIFORNIA COASTAL COMMISSION

San Diego District Office
7575 Metropolitan Drive, Suite 103
San Diego, Ca 92108-4402
(619) 767-2370
PtLaJolla@coastal.ca.gov

Cc: CCC Coastal Prog. Analyst Kaitlin Carney: kaitlin.carney@coastal.ca.gov

Re: Agenda item 6-22-0113 San Diego Point La Jolla Seasonal Closure for Sea Lion Pupping Season

Dear Commissioners,

I am writing in support of the Staff recommendations for sea lion pupping season closure of Point La Jolla for the safety and protection of wildlife, recreationists, and tourists. This letter also addresses an addition to the Special Conditions iterated in the CCC Staff Report.

My background is that of a conservation biologist and environmental consultant based in San Diego and Latin America for over 30 years. In 1993 I established a consultancy, Sage Wildlife Biology (SWB), focused on biological resource analysis and protection. As a wildlife expert and resident of San Diego I have been researching, advocating, and educating people about La Jolla's pinniped problems - and solutions - since 1999. One of SWB's senior biologists, Patrick Hord, spent several years providing leadership for one of the first pinniped docent groups in La Jolla, efforts that garnered co-recipient of the National Environmental Hero Award from the National Oceanic and Atmospheric Administration (NOAA). Therefore SWB is extremely familiar with the history, biology, and management challenges regarding the pinnipeds of San Diego, including the issue at hand regarding the sea lion breeding rookery at Point La Jolla.

The sea lions, breeding females and pups included, in and around Point La Jolla have been subject to unintentional and intentional harassment - and thus violations of federal law and California state regulations - for years. This reality is supported by a plethora of data, observations, and reports to the City and NOAA regarding such harassment, collected over recent years by the Seal Society, among others. Harassment incidents clearly prohibited under these laws have been occurring on a daily basis; and as long as the status quo continues where humans have easy access to sea lions concurrent with zero enforcement of protective laws, this harassment will only continue and escalate.

As someone who has worked and studied various large marine mammal species I can say with confidence it is not a matter of if, but when, a serious injury between careless humans and defensive, breeding sea lion is going to occur at this rookery, especially at the rate and frequency with which harassment occurs year-round. While an instructor for Boston University's tropical program in the Galapagos I witnessed such an event first-hand, not once but twice in one year. Both times I was observing a breeding sea lion rookery in a location where the wildlife had been exposed to tourists in close proximity on a daily basis, thus leading



some to erroneously conclude the animals accustomed to human presence were less reactive, safe to approach closely. Both times I witnessed various tourists approach a sea lion pup to get a photo. (The only rule enforced by tour guides was that no one could voluntarily touch the wildlife.) After about an hour of such, in both incidences a dominant bull male weighing well over 500 pounds attacked one of the selfie-taking tourists, biting them on the leg resulting in serious injury where the victim had to be taken to a hospital via helicopter, one suffering blood loss to the degree it was life-threatening.

There is much that could be said regarding the fact that wildlife laws exist for a reason, to protect the animals and humans that encounter them. Meanwhile sea lions already face many survival risks without the addition of the cumulative impacts of daily human interference; where harassment of the type ongoing at Point La Jolla has been documented to reduce fecundity and compromise immune systems, especially lactating females and their pups. The extreme Mortality Event of a few years ago that included death of many thousands of California sea lion pups via starvation is one example of the species' existential vulnerabilities from pollution, climate change, overfishing, and from interference by a human population that has taken over much of their terrestrial beach habitat.

Instead of reiterating evidentiary details of the issue in this letter, I ask the CCC to adopt the solutions the Sierra Club proposes, detailed in their letters from February 15 and March 22, 2022, as well as considering the supporting arguments of attorney Kristina Hancock (March 7, 2022) and other correspondence by the Seal Society.

Specifically I support the declarations of the Sierra Club's Seal Society letter stating,

"The Sierra Club Seal Society contributed 1,900 volunteer docent hours on site in 2021 and has collected survey and observation data, visitor counts, sea lion counts, birth records, and year-round photo and video documentation of the rookery at Pt. La Jolla and Boomer Beach. Based on this wealth of experience, we recommend:

- Set the sea lion closure dates to a minimum of May 1 - Oct. 31
- Maintain the Temporary Emergency Closure Boundary (blue), with defined access path to trail
- Use the boardwalk and low wall above rookery as a natural separation of people and sea lions
- Provide limited access via the trail to Boomer Beach for entry and exit to the water
- To be monitored by Rangers with enforceable rules/laws to not disturb the sea lions
- To be evaluated via tracking the number of people using the trail and the number of sea lion disturbances as defined by the MMPA.
- Rangers staffed from sunrise to sunset
- The CDP must include a plan to provide public safety and meet MMPA regulations during the 7 month non-closure period by including year-round rangers and some area re-engineering by either replacing the stairs with a viewing platform or preventing public access. This has proven to reduce the number of people in the area by over 90%.
- No dogs allowed year-round."



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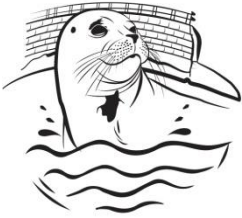
Finally, I request that as an additional Special Consideration the CCC adopt a clear, well-defined plan of enforcement of the specifics of the closure, and all relevant wildlife protection laws. Without such the changes implemented to protect the wildlife are no more than a paper tiger. This reality was witnessed during the time a local ranger was paid to oversee the Casa Beach Harbor seal rookery. Numerous times the ranger told me that he did not have the authority to stop people from harassing the seals, and that he was there only to minimize human-human conflict. His actions supported his claim. While I and two other SWB biologists collected harassment data on the Harbor seal rookery, over the course of several months we observed dozens of intentional harassment violations of Harbor seal mothers and pups that occurred on his watch where his response was to do nothing.

At the very least, rangers must be provided who will enforce restricted access to the beach where pupping occurs. To achieve this 1 – 2 rangers must be posted permanently year-round, at a minimum, during peak hours from mid-morning to 1 hour after sunset. If rangers are employed by a state agency, they have the ability to enforce state law that prohibits harassment of wildlife, and such should be clearly written as part of their job responsibilities.

Thank you for consideration of my comments, I look forward to the CCC's adoption of the proposed protections discussed herein.

Renée Owens

MS Ecology, MS Environmental Science
President, Sage Wildlife Biology LLC
National Sierra Club Marine Team



SEAL SOCIETY

CA. Coastal Commission Meeting 4/8/22

Agenda # 11c

San Diego Pt. La Jolla Seasonal Closure

Robyn Davidoff, Seal Society Chair

Position: Favorable with Special Condition to adopt Closure Boundaries as defined in the Emergency Temporary Closure Permit #2572053

As the Chair of the Seal Society for 4 years, I represent over 30 passionate volunteer docents who contributed over 1,900 hours in 2021 at the Pt. La Jolla and Boomer Beach Sea Lion Rookery. We collected data such as birthing records, sea lion population, number of visitors in the rookery and those watching from the side walk above. We monitored the health of the pups and their survival rates – which exceeded 33% in 2021 when Sharon Melin of NOAA says the typical mortality rate is closer to 25%.

We wrote educational articles in local papers about sea lions to refute self-proclaimed Ocean Advocate Kurt Hoffman's inflammatory and false statements that lack scientific evidence. We attended La Jolla Community meetings only to be shut out of participation on Sea Lion Task Forces and weren't given equal time to speak during public comment. These groups admitted in their February meeting that they lack diversity, are old, rich, and entitled because they pay taxes.

You have seen our videos of the daily harassment these animals must endure so that people can get their selfie without concern for their safety or the safety of the sea lions. People trample the vegetation, climb over the low wall, and cause cliff erosion. People have lost any idea of a code of conduct in their attempt to get a social media "like".

Yet, we persevere to protect these vulnerable sea lion pups and nursing moms from human interaction. **We request your ongoing support by:**

- **requiring San Diego's CDP to adopt the Emergency Closure Boundary instead of the proposed large ocean access and open area.** The Emergency Temporary Closure Boundary used in 2021 complies with the La Jolla Coastal Plan which says "access is defined as designated trails and no access should be approved which would result in disruption of habitat areas". The city's CDP proposal violates the La Jolla Coastal Plan by creating a large and new ocean access path from the cliff to the ocean to accommodate only a few spearfisherman and occasional body surfers capable of handling strong rip tides and big waves.
 - **The Emergency Closure Boundary significantly reduced the number of flushings and calls to the NOAA Hotline.** It is the best "trial" for an ocean access point with ongoing rigorous monitoring.
 - It is noted that the shared use concept was tried in 2012-2014 at the Children's Pool where a 3-foot entry point was allowed during pupping season. It failed to eliminate flushings of Harbor Seals and in 2014 the city applied for a permit to close the area to public access. CDP 6-14-0691
 - All 17 other seal rookeries are closed to human any access during pupping season. Ultimately, this will be the direction for the sea lion rookery.

- **Special Condition #5: Modify to Require more “Closed Sea lion pupping and mating” signs along the low wall:** the city plan proposes 2 signs along 150 yards of low wall above the sea lion rookery. How will tourists know the area is closed once the Rangers leave for the day? In the Emergency Closure Permit 5 signs were placed along the wall. Please require the city to install a minimum of 5 signs.
- **Install a webcam for educational purposes and surveillance if needed.** The Seal Society has already determined a possible location and the vendor.

The docents thank you for your ongoing concern about this unique sea lion rookery – the only one on the west coast of California. This rookery is where people of all income levels can enjoy seeing sea lions birth and raise their young for free from the safety of the low wall.

We support the revised closure dates of May 1 to October 31. **We need you to go one step further and make a condition to San Diego’s CDP to change the closure boundary back to the Emergency Closure Boundary Permit #2572053.**

Robyn Davidoff
Seal Society Chair



Emergency Closure Boundary with public access through trail designated in the La Jolla Coastal Plan. This boundary would protect most of the sea lion rookery.



Thank YOU!

From: [Nathan Brenner](#)
To: PtLaJolla@Coastal
Subject: CLOSE ALL OF POINT LA JOLLA AND BOOMER'S BEACH FOR PUPPING SEASON 2022
Date: Friday, April 1, 2022 1:58:35 PM
Attachments: [3-31-22 pages from la jolla lcp lajollacommunityplanaug2014 \(1\).pdf](#)
[1-10-22 la jolla light opinion rd.docx](#)
[MAP Point La Jolla Seasonal Closure - Emergency Coastal Development Permit No 2572053 FINAL SIGNED 08-10-2021.pdf](#)

Agenda # 11c

Application #6-22-0113

NATHAN R. BRENNER

Position: Favor with Special Condition (Apply Emergency Closure Boundary used in CDP #2572053)

The entire Point La Jolla and Boomer's Beach area must be completely closed from **May 1, 2022 to October 31, 2022**. A PERMANENT CLOSURE OF THIS AREA IS RECOMMENDED AS TOURISM IS INCREASING AND HARASSMENT CONTINUES. THE CITY HAS BEEN UNABLE TO IMPLEMENT A WORKABLE MANAGEMENT PLAN FOR THE ENVIRONMENTALLY SENSITIVE AREA AND IT NEEDS COASTAL ACT PROTECTION NOW!!!

THE SEA LIONS NEED THE ENTIRE ROOKERY AREA AT POINT LA JOLLA AND BOOMER'S BEACH FOR A SUCCESSFUL PUPPING SEASON 2022!!!

The Sea Lions use the entire bluff area from the Wooden Steps to the sand, south of Boomer's Beach for pupping season.

NO HUMANS SHOULD APPROACH SEA LIONS (MMPA) AND VISITORS MUST WATCH THE COLONY FROM BEHIND THE CONCRETE WALL AT POINT LA JOLLA AND BOOMER'S BEACH.

OUR LA JOLLA LOCAL COASTAL PLAN (2014) **DOES NOT RECOGNIZE** THE POINT LA JOLLA WOODEN STEPS (UNPERMITTED) OR BOOMER'S BEACH PATHWAY AS DEDICATED ACCESS POINTS. DEDICATED ACCESS IS AT LA JOLLA COVE, 50 YARDS FROM THE ROOKERY.

THE SEA LIONS NEED THE ENTIRE ROOKERY AREA AT POINT LA JOLLA AND BOOMER'S BEACH FOR A SUCCESSFUL PUPPING SEASON 2022!!!

Nathan Brenner
Law in Motion

Agenda # 11c

Application #6-22-0113

Carol Archibald

Position: Favor with Special Condition (Reinstate Emergency Closure Boundary as used in CDP #2572053)

Dear Commissioners:

I'm very pleased that the City has produced a CDP to close the Sea Lion Rookery during pupping season with many good measures incorporated into it that will help keep the sea lion mothers and pups and the viewing public safe.

Further, I'm delighted that the Commission agreed with the recommended revised dates of closure from May 1st through October 31st, which will give the pups a greater chance of survival as the pup mortality rate in 2021 was considerably higher than normal with 7 stillborns, 6 drownings, and many pups starving when crowds separated nursing moms and pups and moms abandoned their pups due to human scent.

All of Boomer beach is used by sea lions for birthing, nursing, and resting, including the cliffs above the small beach. This is where pups go to get to higher ground during high tides and moms leave them while foraging. The actual number of ocean access users is quite small and the proposed large ocean access area will provide transit through the rookery. The Emergency Closure Boundary was a better solution that reduced the number of sea lion disturbances.

Sea lions have hauled out and given birth at both Pt La Jolla and Boomer Beach since about 2014. Boomer Beach is an integral part of the sea lion habitat and the only beach in the rookery since Pt. La Jolla consists of rocks, cliffs, crevices, and bluffs. As such, Boomer Beach is extremely critical in meeting the biological needs of sea lions including bulls fighting for territory, mating, birthing, nursing, and pups learning to swim. However, since the Commission has accepted the City's plan to close Point La Jolla but keep most of Boomer Beach open for ocean access for swimming, spearfishing, and body surfing, I'd like to consider the consequences of this decision.

Keeping Boomer Beach open during seasonal closure is problematic for the following reasons:

People should not be in a dangerous breeding area: Large bulls weighing 800 lbs. defend their territories and if visitors get close to them, they may lunge, chase, and bite them. Mothers may nip if people get close to their pups. The terrain is uneven and slippery and people are seen to fall frequently.

Sea lion pups are very vulnerable in their first few months of life: Boomer Beach is where 40% of the births take place and, since it is the only beach area in the rookery, pups learn to swim there. Moms nurse their pups for 11 months; pups start foraging for food at 6 months but are not adept at foraging until 8 months (Sharon Melin, NOAA).

Pups are vulnerable to drowning in rough surf as they can't swim well until 3 - 4 months of age. Sea lion pups are vulnerable to human harassment when left alone on land while their moms forage for food as people pet and pick them up.

A large open area for ocean access is confusing and susceptible to abuse as eager visitors attracted by the numerous selfies on social media want to get close to the animals for photos.

There is already a "historic trail" for ocean access on the southern end of Boomer which was used in the previous emergency closure last summer and is sufficient to allow access for spear-fishermen and body surfers. The actual number of users is quite small; we typically do not see more than a few users every weekend. Chief Lifeguard, Gartland has said: "the historic trail is the safest approach to the ocean".

The large ocean access area in the City's CDP negates the purpose and intent of the closure as most of Boomer Beach is included and is extensively used by the sea lions, making it very difficult for rangers to enforce separation of people and sea lions.

I strongly advocate that the Coastal Commission recommend that the ocean access area return to the historic trail used during last year's emergency closure which included Boomer Beach and was then amenable to ocean access users and largely successful in keeping people and sea lions at safe distances.

Thank you for considering this important additional special condition as it is vital to a successful seasonal closure.

Sincerely,

Carol Archibald

From: [Elena Tillman](#)
To: PtLaJolla@Coastal
Subject: Agenda #11C
Date: Friday, April 1, 2022 1:20:38 PM

Dear Commissioners,

Agenda # 11c

Application #6-22-0113

Name: Elena Tillman

Position: Favor with Special Condition (Apply Emergency Closure Boundary used in CDP #2572053

Thank you for your decision for the sea lion pupping season closure dates from May 1 - October 31. Please apply the Emergency Temporary Closure boundary defined in CDP #2572053. This is important for the following reasons:

1) it is dangerous for humans to be in a breeding area: Large bulls weighing 800 - 900 lbs defend their territories and if visitors get close to them, they may lunge, chase, and bite them. Mothers may nip if people get close to their pups. The terrain is uneven and slippery with rocks, bluffs and large crevices. People fall frequently especially in a birthing area.

2) sea lion pups are very vulnerable to being disturbed in their first few months of life: Boomer Beach is where 40% of the births take place and pups learn to swim. Moms nurse their pups for 11 months; pups begin to forage for food themselves around 6 months but are not adept until 8 months (Sharon Melin, NOAA). Pups are vulnerable to drowning in rough surf until 3 - 4 months. Sea lion pups are left vulnerable on land while their moms forage (people try to pet them)

3) an area open for ocean access is confusing and is vulnerable to abuse as people are always eager to get close to the animals as they are attracted by the numerous selfies they see on social media where people have got very close to the sea lions.

4) there is already a trail for ocean access that was used in a previous emergency closure last summer which is sufficient to allow for the access of a few spear-fishermen and body surfers. The actual number of users is quite small and therefore the number of people inconvenienced is small (we typically do not see more than a few users every weekend). Having such a large ocean access area negates the purpose and intent of the closure and will be difficult to enforce by rangers.

Thank you for your consideration on this critical matter.

-

Very Respectfully,

Elena Tillman

From: [Gish, Benjamin](#)
To: PtLaJolla@Coastal
Subject: Request for full seasonal closure of Boomer Beach
Date: Friday, April 1, 2022 4:08:43 PM

Hello Coastal Commission,

My name is Ben Gish and I am a graduate student in Conservation Biology at Miami University. I have been working for several years through my graduate school research on the sea lion rookery in Point La Jolla, attempting to help mitigate conflict between humans and sea lions. I have been informed that a seasonal closure of Point La Jolla has been approved from May 1st, to October 31st for sea lion pupping. This is excellent news and I greatly appreciate your consideration and action taken on this subject.

It is to my knowledge that Boomer Beach will remain open for ocean access (swimming, spearfishing, body surfing, etc). I am sending this email as a request that the Coastal Commission may consider (and approve) Boomer Beach to be seasonally closed along with Point La Jolla. The seasonal closure of Point La Jolla is a big win for the sea lion rookery and the neonatal success that should find the new pups born this year, however Boomer Beach serves as a valuable and non-detachable part of the sea lion rookery.

Boomer Beach is used by large numbers of sea lions each year - Roughly 40% of the sea lion births occur on Boomer Beach (Sierra Club San Diego). Boomer Beach serves as the easiest access point to and from the ocean for the sea lions, as it is away from the rough rocks in other areas of the rookery. Mothers use Boomer Beach to enter the ocean to hunt for food in order to maintain milk production for their offspring. Development for pups occurs from 6-8 months, and they are not usually adept until about 8 months old (Sharon Melin, NOAA). Still enabling public access to this area during pupping season will inhibit mothers from moving around freely, and increase disturbances to pups in their early and formative months (which can be detrimental to their health and development). When left on land, sea lion pups are also vulnerable to human encroachment, as people attempt to pet them. Finally, frequent human presence may cause females to abandon their pups (NOAA Fisheries).

Human activity in breeding areas is dangerous - Large sea lion bulls are frequently present during this time, and they will defend their territories if visitors get too close to them. They may lunge, chase or bite them, and they can weigh up to 800 pounds (NOAA). Furthermore, the terrain is uneven, filled with bluffs and crevices that people may fall into, and it is slippery at times.

There is already a trail used for ocean access that was used in a previous emergency closure last summer. This trail is sufficient to allow the access of a few spear-fishermen and body surfers. Boomer Beach is a large ocean access area, and having it open will negate the purpose and intent of the nearby closure, and will be difficult to enforce by the Rangers, as the line becomes blurred between what is open and what is closed.

Lastly, I have done on-the-ground research in La Jolla on human presence in sea lion territory. Throughout my studies, I have learned and observed that the staircase at the end of the boardwalk in Point La Jolla serves as a prime access point for visitors to descend into sea lion territory, and access Boomer Beach. These stairs are how most of the people that interact with the sea lions end up down in the rookery, and I strongly recommend that these stairs should be removed or closed year round. Below is a link to my most recent work, as well as an op-ed I published in the La Jolla Light:

Research

Paper: https://docs.google.com/document/d/1aG3oRLLZMUZrWqFQC0ZpdfYQ7ZKa4TzocUh9ZD281_c/edit?usp=sharing

Op-Ed: <https://www.lajollalight.com/news/opinion/story/2022-01-03/guest-commentary-more-warning-signs-at-point-la-jolla-dont-do-enough-to-reduce-human-sea-lion-contact>

Thus, including Boomer Beach in the seasonal closure will ensure that the entirety of the rookery is protected, avoid confusion between what remains open and what is closed for public access, and will be easier to manage on a local and environmental scale. The amount of people utilizing Boomer Beach for access to the ocean for outdoor activities is quite small - the majority of Boomer Beach users are there to view (and unintentionally) harass and encroach on the sea lions. Ensuring a firm closure of both Point La Jolla and Boomer Beach would be in the Coastal Commission's best interest in order to have a successful overall closure.

Thank you for considering these points of discussion. If you have any questions, please do not hesitate to contact me at this email, or my cell phone: 619-729-8790.

Ben Gish

Sources used for reference:

Sierra Club San Diego

NOAA Fisheries, <http://www.pointsur.org/documents/NOAA.pdf>

Sharon Melin, Research Biologist, Alaska Fisheries Science Center

Species Directory, NOAA: <https://www.fisheries.noaa.gov/species/california-sea-lion#overview>

From: [natalie cibel](#)
To: PtLaJolla@Coastal
Subject: Letter to Coastal Commission
Date: Friday, April 1, 2022 1:30:39 PM

Hello, my name is Natalie Cibel and I am a docent with the SD Seal Society. Below is my letter of concern. Thank you.

As soon as I arrived in San Diego, I was on a mission to see marine mammals from land for the first time in my life. So, as any tourist might do, I made my way down to the famous La Jolla Cove. I distinctly remember feeling uncomfortable watching people pose for selfies with sea lions and wondering why this was allowed. It's been nearly five years since that first experience and I am still asking this same question today.

At the time of my visit I was completing my Environmental Science and Biology degree and decided I would do anything to work with marine mammals. There wasn't as much opportunity to work with them on the east coast, so I packed up my car and moved across the country to pursue my quintessential California dream.

I've spent the last few years establishing my career as a wildlife biologist. Some of my most notable experience includes working with the San Diego Zoo on Coronado Navy Base to study the endangered California least tern and the Western snowy plover, as well as surveying for the burrowing owl and the critically endangered Mojave desert tortoise with the US Geological Survey.

I am also a proud member of the San Diego Seal Society. I regularly docent to educate and communicate with the public about our efforts to protect harbor seals and California sea lions. Part of my job as a volunteer and biologist is to observe animals, document behavior, and understand human impacts on their environment.

With that said, I have never once in my career regularly witnessed such atrocities to wildlife as I have seen at Point La Jolla as a direct result of human disturbance. People have been seen petting, kicking, throwing sand at, and even picking up seal pups to pose for photos. This type of behavior is seriously disturbing to the animals and can result in dangerous physical conflict as well as mothers abandoning their pups. It is also illegal as it violates the Marine Mammal Protection Act. I realized my dream to study marine mammals was a little different than I had originally anticipated. I immediately recognized the need to incorporate a human dimension of conservation management and, simply put, that has turned into babysitting the public.

If the Seal Society docents had a choice, we would much rather educate people and observe these wild animals act naturally, but we do not have that option. With the absence of rangers, we are left without enforcement to provide proper protections. The La Jolla Sea Lion Rookery is cited by Travel Advisor as the #9 best beach to visit in the U.S., attracting visitors from all over the world at a rate of up to 300 people per hour. Many complain of the lack of enforcement and ask why the area is open to the public. It is an embarrassment to San Diego to allow such horrific human harassment to occur and it is unsafe for both people and sea lions.

Fortunately, at Children's Pool we see a different, much calmer setting of undisturbed and

relaxed harbor seals as a result of a 5 month seasonal closure. We thank our volunteers, including Pam Thomas who helped the harbor seals see these protections after a decade of unnecessary conflict.

The Seal Society continues to advocate for a similar seasonal closure for the sea lions at Point La Jolla. The problem with the proposed closure dates of May 25th to September 15th is that this period is not long enough to meet the requirements and purpose of the closure, i.e.; protecting sea lions from human interaction, aligning with the MMPA, and ensuring public safety.

Point La Jolla should see a similar five month period of closure instead of only three months. Sea lion pups cannot feed themselves until eleven months old and they do not swim well until they are at least 3-4 months old. This means they require more time on land. The Seal Society has records proving that sea lion mothers and pups use Boomer Beach to haul out and rest. Six recorded births occurred on Boomer Beach in 2021 in the last week of May. Mothers will also leave their pups for long periods of time on Boomer Beach while they hunt for food. Seal pups become vulnerable to human harassment, which causes abandonment by their mothers. If closure doesn't occur until May 25th, pups will be born while the rookery is open to people. Closure dates must be set at a minimum of May 1 to October 31 for pupping season to be successful. The Boomer Beach access is also necessary to include in the closure to provide full protections for the animals during pupping season.

If we want to see these animals around for the next generation to enjoy, then we must go beyond a seasonal closure and provide a full year closure with rangers present. Are we going to wait until this population becomes nearly endangered to care? What will happen to them in 10 years when La Jolla experiences even more visitors and residents?

We can be a leader in this human-wildlife conflict by using sound conservation science to govern this embarrassing mismanagement of humans and wildlife. A solution is made possible when we all work together to benefit the co-existence and safety of wild animals and humans.

I want to thank Carol Doyle, Robyn Davidoff, Ellen Shively and Pam Thomas for being role models in providing a solution to this human-wildlife conflict. They have inspired me to take action and speak up for the protection of these marine mammals.

“Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has.” Margaret Mead

From: [shea :{](#)
To: PtLaJolla@Coastal
Subject: Requesting Point La Jolla's Closure
Date: Friday, April 1, 2022 1:02:57 PM

Dear California Coastal Commission,

I am a student from La Jolla High School and president of my school's "Pro-Pinniped Party," a student advocacy club founded with the intention of protecting La Jolla's seals. I'm writing today with concern for Point La Jolla's closure. Along with my fellow members who meet at Point La Jolla weekly, I believe Point La Jolla must be closed during pupping season.

The Coastal Commission must protect the rookery and should not allow access through the rookery due to the risk this would hold for newborn pups and their mothers. Instead, nearby ocean access should be utilized for those who require a path. It simply isn't safe for animals or humans for swimmers or fishers to use Point La Jolla as ocean access.

The seals have faced continuous harassment and abuse, as noted by videos and even the recent death of a yearling last summer. The Commission currently has the opportunity to act to minimize any risk of human-seal interaction, an opportunity the Commission must take advantage of. Please consider working to protect the rookery by limiting human access and promoting the use of the southern trail instead.

Thank you,

Shea McAuliffe
La Jolla High School

From: [carol.toye.woodroffe](mailto:carol.toye.woodroffe@ptla.com)
To: PtLaJolla@Coastal
Subject: Submission on Closure of Point La Jolla : Agenda # 11c Application #6-22-0113
Date: Friday, April 1, 2022 4:12:15 PM

Ref: Submission on Closure of Point La Jolla : Agenda # 11c Application #6-22-0113

Dear Commissioners,

I am a British National with permanent residency in the USA having moved here almost 3 years ago. I have been blown away by the natural beauty of California with its State and National Parks and amazing coastline.

I consider myself extremely lucky to be able to call myself a resident of La Jolla. La Jolla is indeed the jewel that is renowned to be. The coastline is in the privileged position of attracting a multitude of marine and bird wildlife due to its deep underwater canyon off La Jolla Shores and two marine reserves. These have created the perfect environment for marine life to thrive including the seal and sea lion rookeries.

This unique wildlife has attracted tourists from all over the world but I have been dismayed at how little protection the sea lions have from people freely approaching them, taking selfies and even trying to pet them. I have lived in 7 countries on 3 continents and travelled to over 30 countries but I have never seen such lax management of a wildlife area with large wild animals. The rookery is situated in an urban environment where these indigenous marine mammals deserve to be protected from humans in the small areas that they have chosen to breed.

This led me to join the Sierra Club Seal Society and help advocate for better protection for the sea lion rookery. I want to thank Commissioners for listening to the concerns brought to your attention by representatives of the Society and your lead in guiding your staff in their careful review of the science and facts.

Although I agree with all the CCC staff recommendations, I urge you to reconsider the creation of a large ocean access area on Boomer Beach and recommend that the City goes back to the borders used in last summer's emergency closure. These successfully and drastically reduced the numbers of incidents.

The creation of 3 areas with different rules overly complicates the situation and the job of rangers to keep the area safe. All of Boomer Beach is used by sea lions to haul out and pup counts have shown that 40% of births occur on the beach. In addition, territorial bulls fight from the water's edge to the wall. The closure boundary proposed by the CDP will leave half of the sea lion rookery open to disturbance and therefore this will not achieve the "clear and enforceable line between public access restrictions and sea lion protection at Point La Jolla" as recommended by staff in their report. It should also be noted that all 17 other seal rookeries in California are closed to the public during pupping season and they have no allowance for ocean access during this period including the Children's Pool during Harbor Seal pupping season.

This type of access I understand was tried at Children's Pool for the seal pupping season and was abandoned due to it being abused by some of those opposed to the closure. Although I

understand that ocean access is important to ocean recreational users, the whole area of closure represents only 150 yards of coastline within La Jolla's 7 miles! Ocean access remains during the winter months. As Boomer is only used by experts, being subjected to strong rip currents, users are savvy enough to know the other entry points during the closure period at the South end of Boomer Beach, through Shell Beach or La Jolla Cove. The vast majority of visitors that we meet whilst acting as docents are more than happy to view them from the sidewalk wall as nowhere else can sea lions be seen in this way.

Thank you for your consideration of this amendment and thank you for all the work that you do to keep the California coastline the envy of the world.

Carol Toye

From: [Garfield, Judith](#)
To: PtLaJolla@Coastal
Subject: in strong support for detouring ocean users to the southern trail access during pupping season
Date: Tuesday, March 29, 2022 1:03:21 PM

To the Commission:

Please do not undermine the reason for closing Pt. La Jolla during sea lion pupping season.

Do understand that the CDP boundaries are not acceptable because they allow ocean access directly through the (protected?) rookery of newborns and nursing pups during their reproductive season. Allowing access would be the antithesis for setting these boundaries.

The problem is easily solved by rerouting users to the close-by southern trail. This access is nothing new as spearfishers and body surfers have been using it as a common entry point for decades.

Keep in mind that access through the rookery supplies its own dangers year round due to surf, swell, rocks, and reef that define the jump-off point. So, despite users who have been quiet vocal in demanding this access remain open (though they need only make a small change to their water entry location), their overall numbers are small.

I appeal to all of you to resist negating the overall larger purpose for closing the rookery to pupping season; deny access to those wanting to trample through this small area for their own singular purpose during this sensitive time.

Sincerely,

Judith Garfield

Author: The San Diego-La Jolla Underwater Park Ecological Reserve: Vol. 1., La Jolla Cove; Vol. 2., La Jolla Shores & Canyon

From: Michael Brown
To: PtLaJolla@Coastal; [Docent Seal Society](#); [Pam Thomas](#); [Sheila Porter](#); [Nancy McCarthy](#)
Subject: Sea Lion Rookery Closure
Date: Monday, March 28, 2022 7:37:36 AM

Hello,

While living in the bedrock neighborhood of La Jolla California, I ventured out to enjoy some of the local natural wildlife. I was quite excited to see the seals and sea lions in my neighborhood. These animals are quite interesting to watch as their behaviors are sometimes similar and other times quite unique to their respective species. As I read more about these animals and their breeding seasons, I became more aware of the conflicts between those wishing to protect these animals and their breeding areas versus those individuals seeking open access to the ocean.

As I began to learn more about these issues, I became acquainted with the San Diego Seal Society. Because one of their missions is to inform the public about the value of these animals and their need for protective habitats during their breeding seasons, I decided to become a docent for this group. My role as a docent was to help visitors to this area better appreciate the characteristics of these animals. Additionally, I helped visitors understand the importance of keeping a respectable distance from these animals while they were rearing their young. Having spoken to well over 100 individuals regarding the animals' need for space, they all commented that they did not understand the possible harm close proximity could do to these mothers trying to give birth and rearing their offspring.

I was quite surprised in speaking with these visitors that they came from all over the world to see the seals and sea lions. Individuals from Canada, Australia, New Zealand, Germany, Finland, Japan, Mexico and other countries sought out specifically to come to this area to view this wildlife. La Jolla is quite unique in the fact that they have two areas chosen by the animals in which to produce future offspring. The city has provided easy viewing access to rookeries used by the seals and the sea lions to mate and raise their young. This easy access encourages visitors to view and to learn about these magnificent creatures. It goes without saying that these visitors will encourage others to come to this area to see the animals and contribute financially to the local economy.

It is my understanding that the city of San Diego in cooperation with the California Coastal Commission has tentatively approved a sea lion rookery closure from May 1 through October 31 annually. What remains in dispute is the actual closure parameters for the sea lion rookery. The closure of the Boomer Beach area is critically needed to ensure the protection and rearing of newborn sea lion pups. I am sure that by now everyone is fully aware that some human interaction with the animals during the birth and early rearing of pups can have disastrous effects on the longevity of these newborn animals. Closure of the Boomer Beach area would help greatly with the preservation of the cycle of life for these animals. There are other areas in close proximity that allow individuals open access to the ocean. Certainly, for the short time the sea lion rookery is closed during the pupping season, these individuals, while perhaps inconvenienced, would still be allowed access to the open ocean.

As you are certainly aware there are more and more visitors coming to La Jolla every year to see these magnificent animals. I applaud the city's efforts to provide daily Rangers in late April to assist in managing the viewing opportunities for our visitors. As a docent, this assistance will enable me to focus more on educating the public about the value, characteristics and antics of these animals.

On another note, many visitors have asked if there were live feed cameras at the birthing areas for seals and sea lions. As you are aware many cities have a variety of web cameras that feature interesting aspects of their communities. From traffic cameras to weather cameras to animal cameras, communities are showcasing things of interest. Seals and sea lions have already shown to be of great interest to the thousands of people coming to La Jolla to see these animals. The addition of web cameras in these areas would widen the audiences of individuals who perhaps are unable or have mobility issues to view these animals. Web cameras would also provide educational opportunities for children and others seeking to observe animals in their natural habitat that are not contained in zoos. Perhaps local businesses and or community organizations would be willing to purchase, erect and maintain these web cameras in exchange for local advertising.

I wish to thank you for this opportunity to provide input on behalf of these animals who are unable to speak for themselves. I appreciate how challenging a resolution to the closure area for this rookery can be. Thank you for all your efforts.

Michael Brown

From: [Project Kolika](#)
To: PtLaJolla@Coastal
Subject: Seasonal Closure of Point La Jolla
Date: Wednesday, March 30, 2022 5:48:49 PM

Hello Coastal Commission team,

Thank you for accepting the City's plan to close Point La Jolla to help protect our local sea lion colony! However, I see that you're on the fence about closing Boomers Beach. I understand this can be a popular spot for tourists, but the fact of the matter is it's a dangerous location for several reasons: the waves and surge can be very strong at Boomers Beach and the sea lions use that area quite frequently and can become aggressive, especially during pupping season.

Our team of marine biologists spent almost 2 years identifying sea lion anthropogenic stressors and are now in the process of publishing our work. Although I cannot state what the exact results of our study were (because we are publishing), I can say we saw a dramatic difference in harassment events when Point La Jolla and Boomers Beach were closed last summer; there was almost no harassment from humans during that time period. This proves the closure was extremely effective.

Apart from our research, it's known that it is very dangerous for humans to be around sea lions during their pupping and breeding season; sea lion males can reach up to 900 lbs. (that's basically the weight of a bear) and we've seen many close calls from bulls charging towards humans. Boomers Beach has large males fighting each other and competing for females during the summer months. In addition, the sea lions come in and out from the ocean at Boomers Beach and having too many people on that beach come summertime, prevents males, females, and pups from coming on to shore, as our team has abundantly observed.

Honestly, tourists have many beaches to safely enjoy in San Diego. If the closure of Boomers Beach is an annoyance to tourists, they can enjoy the La Jolla Cove or even La Jolla Shores. Spearfishers and body surfers have an accessible trail for ocean access if need be. These kinds of ocean goers pose no threat to our sea lion colony, as they are avid water people and tend to stay out of their way. Unaware tourists and beach goers are our concern, as sea lion pups are extremely vulnerable during the first few months of being born. Additionally, Boomers Beach accounts for 40% of sea lion births, further proving humans have no business there during these months. Disturbance could prove fatal to sea lion pups, as our team and other NGOs have observed.

Thank you for deeply considering closing Boomers Beach from May 1st to October 31st, and I hope you appreciate the hard work we've put in to protect both humans and marine life. We strive for people to enjoy these animals from a safe distance and have heard from many tourists and the public visiting Point La Jolla/Boomers Beach that they prefer seeing animals in their natural environment while undisturbed. We're confident you'll make the right choice!

Cheers,
Cassie Paumard
Founder and Lead Marine Biologist of Project Kolika
projectkolika.org

From: Paul Emus
To: PtLaJolla@Coastal
Subject: Boundaries
Date: Thursday, March 31, 2022 4:46:08 PM

It is really ridiculous the proposed artificial boundaries for the Boomer Beach pupping area. Ocean access goes right through the rookery of newborns and nursing pups. The access must be as far south as possible and a trail there has been used for years by spearfisherman and body surfers.

I understand the grassy area is used by divers to organize their stuff, but the actual number of users is quite small to inconvenience, and they can access at the Cove where there are lifeguards and a stairway, not some ad hoc supposed "trail."

Thank you.
Paul Emus
San Diego
Sent from my iPad

From: [D Beal](#)
To: PtLaJolla@Coastal
Subject: Pt La Jolla Closure - Boundaries
Date: Sunday, March 27, 2022 5:26:10 PM

Dear Sir / Madam:

The current CDP boundaries as stated will not be as effective and are inappropriate because it will give ocean access straight through the sea lion rookery where many pups are birthed and nursed . The southend trail is the best access point and has been used for years by both spearfishermen and body surfers. It would be most effective if the emergency closure boundary provides limited access via this southend trail to Boomer.

Also please note that the actual number of people that use the area is a very small number so would not inconvenience many.

Thank you in advance for your consideration to this important decision.

Warmest regards,

The Beal Family

From: [Ellen Shively](#)
To: PtLaJolla@Coastal
Subject: Hearing for Pt. Jolla/Boomer Beach April 8th
Date: Monday, March 28, 2022 11:38:28 AM

Dear California Coastal Commissioners;

As a Sierra Club Seal Society docent at Point La Jolla/Boomer Beach for the last 3 years, I have had many occasions to watch the interactions of the socially adept sea lions during the pre-newborn period and during the neonate period and the spectacle of the harem norm. It is an intense yearly ritual for the sea lion colony and having access to not only Point La Jolla, but the majority of Boomer, being essential to the well being of this species.

I often equate their needs with ours and always come to the conclusion that member security is as essential for the seal ions as is our own. The main difference is that their circumstances are so much more perilous than ours. For example, we have monitoring throughout the pregnancy by medical qualified help. We have a secure living space, we have an adequate food source and nutritional education to help us along. We do not suffer predation from other wildlife. We do not have dangers all around from the environment, such as a warm dry, safe place to rest at will. Perhaps that is partially why there such disparity between the average lifespan of marine mammals living in the ocean; 17-22 yrs vs. 25-30 years if captive.

Given that the population explosion of the La Jolla colony has not occurred in the last three years, and the pup counts have fallen into a similar mortality prediction of losing close to one half within the first year, it seems that the Commission could recommend closure of the major portion of Boomer Beach for the duration of the pupping season, May 1-October 31.

Thank you for your diligence in advocating for an adequate amount of space for freedom of normal movement and harem requirements for the La Jolla Sea Lions. They are a unique and cherished natural resource in this location and qualify for your own mandate of marine life protection

Ellen Shively
San Diego, Ca
ellenshively@sbcglobal.net

From: [Elena Tillman](#)
To: PtLaJolla@Coastal
Subject: CDP
Date: Friday, March 25, 2022 7:37:25 PM

Dear Sir/Madam,

BLUF: a large access area negates the purpose and intent of the closure.

Firstly, thank you for your careful consideration of the CDP boundaries. A few points to please kindly consider: CDP boundaries as stated are inappropriate because currently they invite ocean access straight through the sea lion rookery where there are newborns and nursing pups. The southern trail has been deemed the best access point as it has been used for years by spearfisherman and body surfers. Best practice would be reflecting the emergency closure boundary with limited access via the southend trail to Boomer that spearfisherman use.

Further, the actual number of users is quite small and therefore the number of people inconvenienced is also small.

In sum, the proposed boundaries would not be nearly as effective as if there were emergency closure boundaries in place.

Thank you for your time and consideration during this landmark decision.

Best,

Elena Tillman

--

Best,
Elena Tillman

From: [Carney, Kaitlin@Coastal](mailto:Carney,Kaitlin@Coastal)
To: [Carney, Kaitlin@Coastal](mailto:Carney,Kaitlin@Coastal)
Subject: FW: Important Hearing Notice
Date: Tuesday, March 29, 2022 8:26:14 AM

From: Craig Caldwell <ccjeeps@gmail.com>
Sent: Tuesday, March 29, 2022 7:38 AM
To: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>
Subject: Re: Important Hearing Notice

Please vote to close off area for seals, people have so many options to enjoy entering the ocean, while seals don't. Show some compassion, not greed, or ignorance. Also provide security in area, to allow pups to live, without harassment.

Thank you,
Craig Caldwell

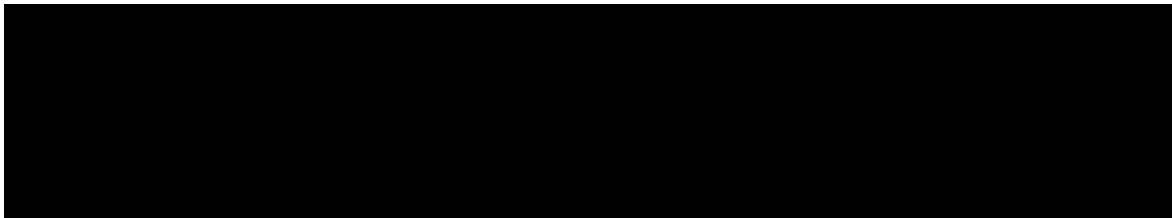
On Thu, Mar 24, 2022, 1:50 PM California Coastal Commission <sandiegocoast@coastal.ca.gov> wrote:

Good Afternoon,

Please see the following for an important hearing notice. Should you have any questions, please do not hesitate to reach out to us at the following:

California Coastal Commission – San Diego District Office
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
(619) 767-2370
SanDiegoCoast@coastal.ca.gov

Thank you.



□



From: [F. Hall](#)
To: [Sealife@Coastal](#)
Subject: Report
Date: Wednesday, March 30, 2022 4:41:22 PM

My report from Sunday
03-27-22

I arrived at the La Jolla cove area close to 5:pm on Sunday, March 27th, 2022.

There were many people using the little gate on Prospect St (across from Brockton Villa where sea lions gather on those cliffs . I stayed there and advised them not to use flash lights or get close to them . I went over to Beach where there were many sea lions on the exposed rocky area all sea lions hiding from people and not resting there any more . I went down to the closed for pupping season Casa Beach. no seals were on this beach.

I went back to sea lions and saw a mother sea lion was coming up to rocky hill area as there were nobody there . I took her picture with her pup . I stayed till 6:17pm. There were people were using their flash lights straight to sea lions eyes . They barked at them .

It is so sad to see how sea lions do not have a safe place. They seems like refugees that ran away from fear and do not have a safe place

To rest with her child and they go from one place to another not feeling safe .

Looking at mother seal with her pup I am praying they find a safe place and leave the area one day so they do not have to suffer so much by people and the group who show ignorance around the animals and are selfish human beings . Also we need to have a government, law makers , and Rangers that care about nature and other species in nature and protect Marin Mammal Protection Act Law

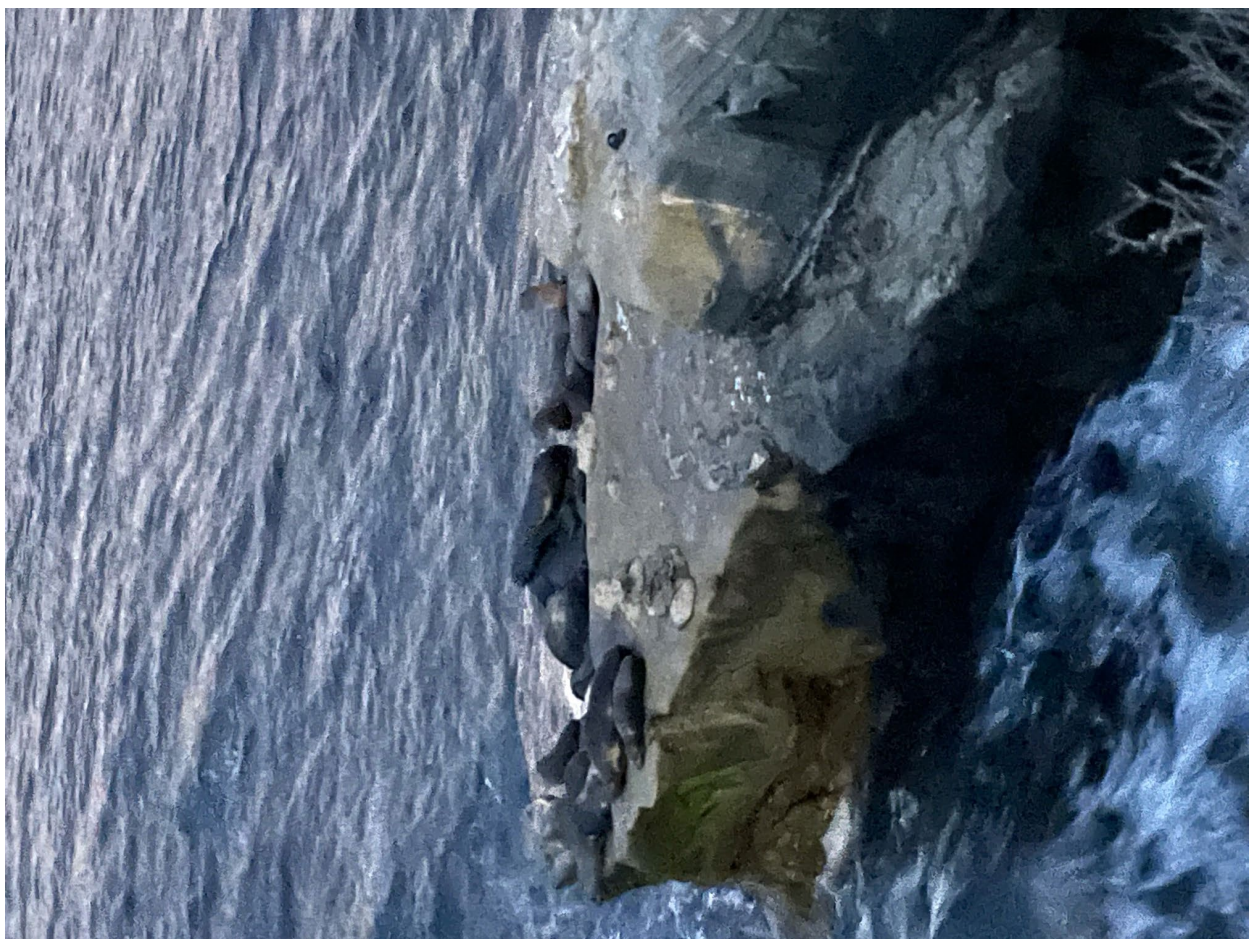


















F. Molini
San Diego
Have a great day

From: [Carney, Kaitlin@Coastal](mailto:Carney.Kaitlin@Coastal)
To: [Carney, Kaitlin@Coastal](mailto:Carney.Kaitlin@Coastal)
Subject: FW: Public Comment on April 22 Agenda Item Friday 11C Application 6-22-0113 (San Diego Point La Jolla Seasonal Closure)
Date: Monday, March 28, 2022 9:51:20 AM

From: William Canning <canningw@gmail.com>
Sent: Saturday, March 26, 2022 11:22 AM
To: SanDiegoCoast@Coastal <SanDiegoCoast@coastal.ca.gov>
Cc: William Canning <canningw@gmail.com>
Subject: Public Comment on April 22 Agenda Item Friday 11C Application 6-22-0113 (San Diego Point La Jolla Seasonal Closure)

My comments on San Diego Point La Jolla Seasonal Closure

As a local La Jolla resident and ocean swimmer I was concerned and alarmed to read of the Sierra Club Seal Society's proposed year-round closure of Point La Jolla and access to Boomer Beach. This was in spite of a locally protested and overly generous compromise offered by the City of San Diego to close the area for 5 months during sea lion pupping season.

There is little scientific evidence to back either proposal. The California Sea Lion is not endangered. According to NOAA, the California Sea Lion population was 70,000 in 1972 when the Marine Mammal Protection Act was passed. The population today is estimated to be 300,000 a more than 400% increase. Scientific studies have indicated this level to be healthy, robust, and optimally sustainable for the species.

The sea lion population at Point La Jolla is growing and thriving. The number of new seal lion pups born is at record levels. The sea lions are already expanding to Boomer Beach and La Jolla Cove. The proposed closures will accelerate this process. It won't be long before the Seal Society will insist these iconic and historic beaches be closed as well.

We've seen the same thing happen at another local beach, La Jolla Children's Pool. This is a popular beach for children due to its calm water. Recently the city spent over 4 million dollars to build a new lifeguard station there. The beach is now closed 5 months of the year for harbor seal pupping season. The harbor seal population is currently thriving and expanding to nearby Casa Beach. It's likely this is the Seal Society's next target for closure.

It's time for our public officials to stand up to outside groups. There are already laws in place to protect marine mammals that do not involve closures. Side effects including increasing birth numbers overflowing to adjacent beaches have not been studied or addressed. Our local coast is in an urban environment. A human near a sea lion does not create an urgent crisis. Policies should be based on facts and not alarmist views.

This proposal needs scientific study of the side effects from closure. If the sea lion population increases as a result and expands to adjacent beaches will they be candidates for closure as well? Will access to the public also be denied because of the overflow? None of these concerns have been addressed. The City of San Diego is already hiring additional rangers to patrol the area and warn the public when they are too close. That should be a sufficient deterrent to avoid closing access to our public beaches.

Honorable Decisionmakers:

Opinion and attached Facts on Application No. 6-22-0113 Seasonal Closure of Point La Jolla:

As a member of the Sierra Club for just under 50 years, I have been a leader and instructor for outdoor activities during most all that time. I have interacted with hundreds of other members and can confirm that all other members I have spoken with are strongly opposed to blocking access to the ocean at all of Point La Jolla. I am also an active water person who enjoys initiating my water activities from Scripps Park that was named after the great visionary and philanthropist Mrs. Ellen Browning Scripps who shaped San Diego for the BENEFIT of PEOPLE – NOT ANIMALS! As a member of the San Diego section of the Sierra Club, I get a quarterly newsletter with a column written by Ellen Shively the creator and leader of the tiny Seal Society Club which was not originally connected with the Sierra Club. Ms. Shively published this: "The sea lions had been considered a nuisance with their noise and blamed for causing the odorous ambience along the cliffs at the cove. The city began to spray the rocks with de-fouling sprays, and the disturbed colony moved over to its current location." Her publicly written statements indicate that the city should spray at Point La Jolla to send them back to where they were or some very private and suitable beaches a couple miles north to just south of the Torrey pines golf course which would solve the current problems at Point La Jolla. All the citizens of the city do not deserve to have any access to our entire coastline blocked.

Facts regarding the following Photos:

In the top photo, Ms Ellen Shively is getting her selfie photo with sea lions running from her in the background. This is exactly what she is supposedly trying to forbid all of the public from doing as she is blatantly harassing the sea lions herself. In the same photo, Ms Shively confirms she does not know the difference between the Sea Lions behind her and seals which she is calling them in the sentence below her which does not indicate that she is qualified as the educator she is professing to be. She is also deliberately misleading the public by calling herself a docent when in fact she is The Ringleader of the tiny band of armchair wanabe environmentalists who gloat at being able to manipulate the city leaders to close beaches as she did at Children's Cove. In the lower photo, note that she is the author, creator, and leader of the Seal Society Club that annexed itself to the Sierra Club and that she states that the city is responsible for moving the sea lions to their current location. That decision on the part of the city is causing much heated discussion among her group and the local community that has always had and continues to expect unlimited access to the ocean. In Ms Shively's articles she expresses in a sobbing tearjerker fashion how horribly these poor pitiful animals are being treated as they lay out sunbathing on San Diego's most pristine real estate in great mobs as they have been doing for hundreds of thousands of years until Ms Shively suddenly decided in the last year that they needed some special protection. Those so called poor, pitiful, helpless animals get better health care from Sea World than I get from Medicare. It is the city's responsible to move them back to where they were, and the seal society club issues will be resolved, and the public will have full access to the ocean as we are legally entitled to. MS Shively and her tiny band are oblivious to and ignorant of the rich history of this area from the thousands of years of occupation by native peoples to the recent 100 years of surfing, diving, underwater photography, swimming, paddling, sailing, lifesaving innovation that is going on here. And of course, desecration of our dead and highly respected friends and relatives which is clearly identified by the city approved monument to David C Freeman (as reads down the 5th vertical column of letters) and all watermen that it was created for, paid for, and installed directly in front of our beloved Boomer Beach surf break by The Boomer Beach Body Surfers. We deserve unlimited access at any and all times from all of the point as we have had since the beginning of time whether the animals are there or not.

Alvin Walter, San Diego, 858 837 1351



Ellen Shively | Photo by Kendrick Brinson

Ellen Shively Saves Space for Seals

The Seal Society docent educates beachgoers about the marine mammals

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Update On Sierra Club Seal Society Campaigns

By Ellen Shively, Sierra Club Seal Society

Two years ago, we were successful in our years-long efforts to lower guano protection for La Jolla harbor seals with the annual closure of Casa Beach to human traffic for the pupping season. Visitors can now enjoy the interaction among the members of the colony as they give birth, nurse and nurture their young and use the beach to warm themselves, rest and move freely about.

The group has since brought to light the similar plight of the sea lions at the nearby Bowyer Beach and Point La Jolla. The sea lions had been considered a nuisance to coastal businesses with first come, first served fee causing the odorous appearance along the cliffs at the Cove. When the city began to spray the rocks and opened a gate to allow public access to the beach, the situation was improved.

For the past two years, decision makers have tried our best to educate the public about the unique natural resource of the sea lion colony. Nowhere else on the CA mainland coast can you see these wild animals this close to an urban setting. The beach is not on the rocky outcrop and beach, a perfect habitat to protect the pups before they are old enough to safely swim the ocean waves and currents.

The main problem has been that the public had little guidance on interacting with the animals. Incidents of disturbances, harassment and even cruel behavior occurred. Last Memorial Day weekend's score of two sea lion deaths occurring because of thoughtless humans was observed by two of our docents and reported to the press. Within weeks, the City approved the suspension of park rangers and revised new signs acknowledging the public to respect rangers and revised new signs acknowledging the public to respect rangers and revised new signs acknowledging the public to respect rangers.

The La Jolla Light then prohibited plans to resume the annual fish fireworks traditionally set off within 20 feet of the park at Scripps Park. The Sierra Club suggested alternative venues such as "Sound and Light" shows and using natural blast noise as a permit from the California Coastal Commission was required due to the proximity of the proposed fireworks to the rocks.

The finally released is a "temporary closure" of the Point and Beach, effective from August 11 thru September 15. Our question now is, "What next? Will we return to the earlier open beach situation with fewer, less back of crowd control? Time will tell, and we will continue to discuss and educate anyone who still listens, and lobby decision makers for improved protection for the sea lions of La Jolla.

We continue to press city officials for a long-term management plan and an annual closure to avoid during the pupping season. We are in contact with decision makers to bring about the protection for the sea lions for a bit of the coast needed for their wellbeing.

If you go, please view the sea lions from the safety of the surrounding sidewalk. Walking on the Point is uneven, slippery and a health hazard. And the animals do need the space provided by the beach.

To join the docent training program, please contact: ellen@shivelyp.com or call HP: (619) 459-3412.



Run Andy Brown



Pup lying in sand with no waves - photo Andy Brown



There is Andy Brown



Arthur with a shark bite on his tail - photo Andy Brown



Photo Sierra Club Seal Society Doc



Pup dead every for drinking milk - photo Andy Brown

Update On Sierra Club Seal Society Campaigns

Ellen Shively, Sierra Club Seal Society

OCT, NOV, DEC 2021
ISSUE! VOL 80 #4

Two years ago, we were successful in our years' long efforts to insure greater protection for La Jolla's harbor seals with the annual closure of Casa Beach to human traffic for the winter pupping season. Visitors can now enjoy the interaction among the members of the colony as they give birth, nurse and nurture their young and use the beach to warm themselves, rest and move freely about.

The group has since brought to light the similar plight of the sea lions at the nearby Boomer Beach and Point La Jolla. The sea lions had been considered a nuisance to coastal businesses with their noise and blamed for causing the odorous ambiance along the cliffs at the Cove. When the city began to spray the rocks, and opened a gate to allow public access to the mammals, the disturbed colony moved over to its current location.

For the past two years, docents have tried our best to educate the public about the unique natural treasure of the sea lion colony. Nowhere else on the CA mainland coast can you see these wild animals this close in an urban setting. The births occur on the rocky outcrop and bluffs, a perfect habitat to protect the pups before they are old enough to safely swim the oceanic waves and currents.

The main problem has been that the public had little guidance on interacting with the animals. Incidents of disturbances, harassment and even cruel behavior occurred. Last Memorial Day weekend's scene of two sea lion deaths occurring because of thoughtless

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From: kurthoffman@san.rr.com
To: Carney_Kaitlin@Coastal; CACC_Epacket@Coastal
Subject: CDP 6-22-0113 Point La Jolla La Jolla Light editorial 3/ 21/2022
Date: Monday, March 28, 2022 2:28:04 PM
Attachments: [Evaluation of Potential Pedestrian Closures Point La Jolla 2021.pdf](#)
[Crisis at The Cove from 5-years ago.pdf](#)
[EIRletterR2S DK.pdf](#)

Sea lion data don't support closure proposals

As a La Jolla resident and ocean swimmer, I was concerned and alarmed to read of the Sierra Club Seal Society's proposed year-round closure of Point La Jolla and access to Boomer Beach (["Arguments for and against Point La Jolla closure plan continue as April Coastal Commission review nears,"](#) March 17, *La Jolla Light*). This was in spite of a locally protested and overly generous compromise offered by the city of San Diego to close the area for four months during sea lion pupping season.

There is little scientific evidence to back either proposal. The California sea lion is not endangered. According to NOAA [National Oceanic and Atmospheric Administration], the [California sea lion population](#) was less than 75,000 in 1972 when the Marine Mammal Protection Act was passed. The population today is estimated to be as many as 300,000, a fourfold increase. Scientific studies have indicated this level to be healthy, robust and optimally sustainable for the species.

The sea lion population at Point La Jolla is growing and thriving. The sea lions are already expanding to Boomer Beach and La Jolla Cove. The proposed closures will accelerate this process. It won't be long before the Seal Society will insist the city close these iconic and historic beaches as well.

We've seen the same thing happen at La Jolla's Children's Pool. In recent years the city spent over \$3 million to build a new lifeguard station there. The beach is now closed five months of the year for harbor seal pupping season. The harbor seal population is currently thriving and expanding to nearby South Casa Beach. It seems likely that is the Seal Society's next target for closure.

It's time for our elected officials to stand up to outside groups and represent the voters who put them in office. There are already laws in place to protect

marine mammals that do not involve closures. Side effects including increasing birth numbers overflowing to adjacent beaches have not been studied or addressed.

Our local coast is in an urban environment. A human near a sea lion does not create an urgent crisis. Policies should be based on facts and not alarmist views.

Bill Canning

From: kurthoffman@san.rr.com
To: kurthoffman@san.rr.com
Subject: FW: CCC Staff Report on Point La Jolla proposed seasonal closure as a California Sea Lion Rookery, CDP 4/8/22 public commentary and CCC Commissioner's vote
Date: Thursday, March 31, 2022 12:10:32 PM
Attachments: [F11c-4-2022-report.pdf](#)
[2 minutes 4. 8 CCC Public Comment on CDP & Staff Report.docx](#)

Ocean Access Advocates,

Friday April 8th 9am -noon and 1:30pm until complete, California Coastal Commission, CCC agenda linked below. Point La Jolla Season Closure CDP request by City of SD is the second to last agenda item, after lunch seems likely with non-agenda public commentary typically taking up one hour or more during the am session. <https://www.coastal.ca.gov/meetings/agenda/#/2022/4> If you are not able to join the zoom meeting on 8th, non-agenda item public commentary is available during the first hour (9am -10am) of the CCC meetings on the 6th & 7th as well. Spreading out our pleas for sanity on this issue could be even more useful as public commentary may be limited once the F11c Point La Jolla CDP application comes up as an agenda item late near the end of the three day CCC sessions.

The California Coastal Commission Staff recommends a May 1 to Oct 31 closure of Point La Jolla and a portion of Boomer Beach with up to a seven-year permit period. OAA, Ocean Access Advocates will be proposing a one-year Point La Jolla Closure, requesting that an EIR, Environmental impact report on the closure related to the surrounding marine environment be commissioned as a requirement of the 1-year CDP issuance. We will be proposing relocation of the CSL Colony to The Devil's Slide Cove, DSC for the safety of the CSL and the public. Enforcement can be accomplished there is only additional fencing at the (CWT) Coast Walk Trail Bridge and signage at the Marine Room ocean access ramp. The difficulty of access to the DSC along the beach and rocks to the North will keep tourists mostly up on the Coast Walk Trail away from the Sea Lions. One Docent or Ranger could be stationed at the Marine Room Beach Ramp and the CWT bridge to inform folks and make sure no one jumps the fence, barbed wire could be included.

Closing all human access at the CWT Devil's Slides Bridge will reduce liability for the City and help preserve the delicate hillside below the historic wood bridge. Human and leashed dog access could be opened over all of Ellen Browning Scripps Park, EBSP immediately after the pupping season closure that is set to wrap-up on Oct. 31st. People and leashed dogs on Point La Jolla, the Bluffs below Brockton Villa and Boomer Beach may encourage the CSL to relocate to the closest protected alternative, Devil's Slides Cove, or to the quite wide beaches below Torrey Pines Golf Course.

If you support this OAA CSL relocation proposal, please consider attending the April 8th California Coastal Commission Zoom meeting to voice your support. If you have another idea to help save Ellen Browning Scripps Park, EBSP and protect the Sea Lions, please share those thoughts as well. The increased eco-tourist activity in EBSP is very destructive to natural and manmade landscape. The tide pools of Point La Jolla as well as the waters around La Jolla Cove and Boomer Beach are being polluted daily with the equivalent of 500 to 800 gallons of raw sewage from the Sea Lion feces and urine, very similar to ours, just more smelly as it is most decaying fish. CSL urine is especially

toxic with very high levels of ammonia and salt from the fish based diet.

Please register through the below link as a Speaker, if you wish to support our OAA relocation proposal, please mention Ocean Access Advocates in your speakers application, after selection of Friday's Agenda item F11c, for Point La Jolla. Please select, # 8. I am representing a group, OAA if you wish to speak as part of our group. If you oppose the above detailed staff recommendation, click the appropriate box. If you wish to submit materials or a PowerPoint for your presentation, up to 40MB can be submitted to materials@coastal.ca.gov

<https://www.coastal.ca.gov/meetings/request-testimony/friday/>

Feel free to call me with any questions, Kurt Hoffman (858) 775-8091

For the CCC meeting 4/8. Apx. 2pm

Thank you Commissioners for patience with the important matter of Point La Jolla and the future of Ellen Browning Scripps Park, EMSP; The Ocean Access Advocates, OAA have been involved in the very public debate of this issue over the past eight months. Our efforts have been documented numerous times in The La Jolla Light, SD Tribune, La Jolla CPA, and La Jolla Parks & Beaches. We have submitted numerous documents to the City of SD and the CCC directly, yet nowhere in the F11c Staff Report is OAA referenced.

OAA in conjunction with the La Jolla CPA & La Jolla Park & Beaches have requested that an EIR be completed to study the environmental impacts of the Sea Lion Colony on the marine environment of La Jolla Cove, Point La Jolla tidepools, Boomer Beach, and the La Jolla MPA. This request was sent to the City of San Diego and the CCC, no responses and no mention of this request in the woefully incomplete staff report.

The environmental impacts of the 500-800 gallons of daily raw sewage effluent from the Sea Lion feces and urine, very similar to ours, just more smelly as it consists of mostly decaying fish. Sea Lion Urine is especially toxic with very high levels of ammonia and salt from their fish-based bait. Each sea lion consumes apx. 15 pounds of fish each day. The Pt. La Jolla tidepools are toxically polluted and dead as a result of this urine. (photo 1)

The La Jolla CPA / OAA EIR request letter is not referenced in the staff report. I sent a copy of it directly to Cheryl Cac so she can't say she was not aware of our well documented request.

The La Jolla Community Groups, CPA & P&B both approved letters drafted by the OAA to preserve access to Boomer Beach and limit the area of the seasonal closure to allow for safe access to Boomer Beach. We proposed a reduction to the handle of the Pork Chop shaped closure area to allow to access on the sloping bluffs at North Boomer and the City of San Diego made modifications to the closure map to accommodate our access requests. Now, we see all our efforts to reduce the area of the closure in the public forum process are being ignored by the CCC staffers.

Commissioners, please don't allow a small group of very active and vocal docents weigh more than the wider voices of the community. OAA, CPA and P&B all expressed overwhelming support of bluff access to Boomer Beach, the drainage duct trail is not a safe access way to the beach, a good number of the Boomer Bodysurfers and free divers are over 50 years of age, as slippery trail overgrown with ice plant is not a safe way for us to transit to Boomer Beach.

OAA, LA CPA, and LA Parks and Beaches request an EIR of the entire marine ecosystem to be a requirement of any CDP approval. This same group has requested that safe access to Boomer Beach be preserved with a reduced seasonal closure area. We have been involved in this very public review process for the past nine months and all our efforts have been ignored by CCC staffers. It is up to you CCC Commissioners to add contingencies to the CDP to protect the

environment and EBSP for the citizens of La Jolla and greater San Diego. Turing EBSP into Sea Lion City is not good for the park or our citizens. The seven-year recommendation for the CDP by CCC Staff is unacceptable as so much more environmental damage can occur in the that timeframe that The Park, The Cove, all of Boomer Beach and most of the La Jolla MPA fish stock may be lost in that period. We request only a one-year seasonal closure with a recommendation to allow to increased dog walking hours in EBSP, The Cove and Boomer Beach as well as complete open access to Point La Jolla and the Bluffs below Brockton Villa after the pupping seasonal closure is complete, no hostile Docents on patrol after Oct. 31st.

Relocation of the Sea Lion Colony via humane means outlined in both the Hanan Associates reports of 2017 & the unreleased 2021 report offer effective relocation and site protection measures. These procedures should be implemented at Point La Jolla, The Cove, Boomer Beach, and the Bluffs below Brockton Villa with the goal of relocating the Sea Lion Colony to the very well protected and inaccessible Devils' Slides Cove, (photo 2)

This location provides a much larger area for the Seal Lions to rest and procreate with less wave action to endanger the pups. Access to this area can be controlled much more easily than Point La Jolla. The Coast Walk Bridge canyon closure can be fortified with more fencing and monetary penalty signage. Signage can be added at the beach access ramp at The Marine Room Restaurant and a single Ranger or docent could be stationed there to educate folks on the permanent closure of the area, if the Sea Lions decide to relocation there. (photo 3)





MARINE PROTECTED AREA

MATLAHUAYL STATE MARINE RESERVE



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C.C.R. Title 14, Section 632. Report violations to 1-888-334-CalTIP (1-888-334-2258). For more detailed information on regulations, boundaries, coordinates, and definitions, visit: www.wildlife.ca.gov/MPAs

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