

## CALIFORNIA COASTAL COMMISSION

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# F13b

**Prepared June 6, 2022 for June 10, 2022 Hearing**

**To:** Commissioners and Interested Persons  
**From:** Dan Carl, Central Coast District Director  
Ryan Moroney, Central Coast District Supervisor  
**Subject: Additional hearing materials for F13b**  
**CDP Number A-3-SLO-19-0026 (Tibbitts SFD)**

This package includes additional materials related to the above-referenced hearing item as follows:

Additional correspondence received in the time since the staff report was distributed



June 3, 2022

To: Donne Brownsey, Chair, California Coastal Commission  
CC: Dan Carl, District Director, Central Coast  
Ryan Moroney, District Supervisor, Central Coast

**Re: Item F13b, 1210 Pacific Street – Cayucos Blufftop Redevelopment**

Dear Chair Brownsey,

On behalf of the Surfrider Foundation our thousands of supporters, activists, and members, we submit the following comments regarding the proposed development at 1210 Pacific Street in Cayucos. Surfrider is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves, and beaches and is fueled by a powerful network of activists.

The uniqueness of this portion of the California Coast cannot be overstated. The proposed development would be located adjacent to a = popular beach, located in a relatively pristine part of California. This area deserves careful consideration and protection from private interests such as seawalls on the coast that will lead to complete beach erosion as sea levels rise. Please consider the following concerns:

- The applicant proposes to replace a reasonably size 1,100 square foot blufftop home in Cayucos and replace it with a structure three times the size in a location vulnerable to rising seas.
- The setback calculation does not incorporate sea level rise into the erosion rate and is insufficient.
- The new development will rely on existing (unsightly) riprap seawall.

New development is not permitted to rely on shoreline armoring and denial would not preclude reasonable use of the lot given there is an existing house; therefore, this project must be denied. Approval of the proposal does not comply with LUP Hazard Policy 1 requiring that new development:

"shall be designed so that shoreline protective devices (such as seawalls, cliff retaining walls, revetments, breakwaters, groins) that would substantially alter landforms or natural shoreline processes, will not be needed for the life of the structure."



Given that the staff report states that the existing riprap structure cannot be removed, the only option left is denial.

Further, the County's local coastal program requires that the setback "ensure 100 years of safety and stability without armoring." The *minimum* requirement is 25 feet. Given rising seas and vulnerabilities, the staff report states bluff retreat greater than 35 to 40 feet in the next 100 years is possible. At a minimum, the Commission should require this greater amount of setback, along with the staff special conditions that preclude reliance on shoreline armoring and repair and maintenance of the existing riprap. Otherwise, the development is not in compliance with LUP and Coastal Act requirements to avoid reliance on shoreline armoring.

If the Commission does approve the proposed development, Surfrider strongly urges the Commission to approve all of the special conditions in the staff recommendation, including the prohibition of repair or rebuild of the existing seawall, along with a greater setback of at least 40 feet. The minimum life of a brand new 3,500 sq. ft. home built by today's standards is assumed to be *at least* 75 years, or nearly 2100. Notably, the LUP Hazard Policy 6 requires that bluff top structures:

"be designed and set back adequately to assure stability and structural integrity and to withstand bluff erosion and wave action for a period of **75 years** without construction of shoreline protection structures . . . ."

The 25-foot setback will undoubtedly disappear during that time based on estimates of SLR and related bluff erosion. The property owner will also undoubtedly seek to protect their home. Approval of this development today would merely be kicking the can down the road.

Please consider that every permitting and planning decision we make today will determine the future of the California Coast. We are effectively deciding which beaches to save and which to sacrifice with each vote for development that includes shoreline armoring. Permitting new development on the shore edge may benefit a private property owner, but the public and coastal habitat and marine life will ultimately pay the price.

Sincerely,

Mandy Sackett  
California Policy Coordinator  
Surfrider Foundation

Jim Miers  
Vice Chair  
San Luis Obispo County Chapter  
Surfrider Foundation