

**CALIFORNIA COASTAL COMMISSION**

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**W12a**

**A-5-DPT-22-0037 (Fallahzadeh Beach Road Home)**

**September 2, 2022**

**CORRESPONDENCE**



September 2, 2022

To: Donne Brownsey, Chair, California Coastal Commission

Cc: John Ainsworth, Executive Director, California Coastal Commission  
Shahar Amitay, Coastal Analyst, California Coastal Commission

**RE: Item W12a, 35525 Beach Road New Residence – Appeal No. A-5-DPT-22-0037**

Dear Chair Brownsey,

The Surfrider Foundation strongly supports the staff recommendation to find Substantial Issue with the proposed development at 35525 Beach Road in Dana Point. The City of Dana Point's coastal development permit would allow a new 4,000+ square foot private residence within a coastal hazard zone that would rely on shoreline armoring. The City's approved project includes construction of a 28-caisson foundation, which is a shoreline protection device and therefore inconsistent with the Coastal Act.

The new residence would be highly vulnerable to shoreline hazards at present day. It is inconceivable that the applicants' submitted coastal hazards analysis does not even address the medium-high risk aversion scenario. Lateral beach access between Poche Beach and Capistrano Beach County Park is frequently impinged on a daily basis during higher tides and this property will most assuredly be situated on public trust land during its lifespan, if not immediately upon construction. To demonstrate the extreme vulnerability of this site, please view our aerial footage, [Capo Beach Park and Beach Road](#) from June 21, 2021 on Vimeo. Below is a screen capture from the video.





The City's coastal development permit inadequately addresses the impingement of public access that would be caused by the new development as well as the existing and potentially unpermitted shoreline armoring that may be associated with it.

If we are to protect our remaining beaches, and the recreational opportunities they provide, from rising seas and increasing coastal hazards, we must cease to construct new development within vulnerable locations. By allowing beachfront and blufftop development to age and eventually phase out, and ensuring no new development is placed in its' stead, we can save our precious coast one parcel and one permit at a time. Please concur with the staff recommendation to find substantial issue with this permit.

Sincerely,

Mandy Sackett  
California Policy Coordinator  
Surfrider Foundation

Denise Erkeneff  
Chapter Coordinator  
South Orange County  
Surfrider Foundation