

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
WEB: WWW.COASTAL.CA.GOV



F15b

Prepared September 8, 2025 for September 12, 2025 Hearing

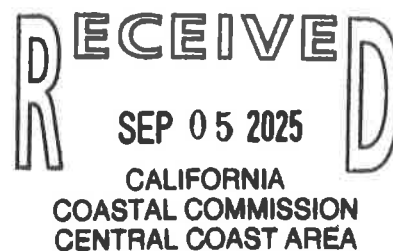
To: Commissioners and Interested Persons

From: Kevin Kahn, Central Coast District Manager
Nolan Clark, Coastal Planner

**Subject: Additional hearing materials for F15b
CDP Number 3-24-1004 (Walsh Revetment)**

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



September 5, 2025

Delivered via email

To: Meagan Harmon, Chair, California Coastal Commission
CC: Kate Huckelbridge, Executive Director, California Coastal Commission
Dan Carl, Central Coast District Director, California Coastal Commission
Nolan Clark, Coastal Program Analyst, California Coastal Commission

Re: Suggestions for F15b, Application 3-24-1004 (Walsh Revetment, Santa Cruz)

Dear Chair Harmon and Commissioners,

Thank you for the opportunity to provide comments on this CDP application to restack approximately 38 tons of rock that has migrated onto the public beach back onto an existing revetment. While Surfrider opposes shoreline armoring due to its negative impacts on our beaches, we are glad to see that the applicant has committed to restacking their rocks in the permitted area and removing them from the public beach.

Redevelopment Status

Surfrider commends Central Coast staff for producing a thorough report. One standout detail was including the Revetment Redevelopment Status in the Special Conditions for this CDP. This same condition appeared in two additional Central Coast staff reports this month for similar revetment restacking applications¹. The reports calculate that 5%, 15%, and 16% of the respective applicants' revetments have been repaired or modified "relative to the 50% redevelopment threshold."

Surfrider finds inclusion of Redevelopment Status to be a meaningful addition to CDP Special Conditions. We request the Commission consider making this standard practice. Including this status ensures the Commission and applicants agree on where development stands relative to the 50% replacement threshold². This gives all parties—including the public who depend on the Coastal Act to protect public trust lands and access—clear information re: the status of shoreline structures that negatively affect coastal access and resources.

Such information is especially important as we face accelerated sea level rise and more frequent storm surge due to climate change. Simply put, we will see more CDP applications to repair, augment, or modify shoreline armoring to protect private structures. Tracking these

¹ Item F15c, CDP 3-24-1005 (Sherman Revetment, Live Oak), and Item F16a, CDPA 3-07-058-A1 (Kessinger Revetment, Pleasure Point). The CDPs are all in the same general vicinity of Santa Cruz.

² Title 14, Division 5.5, Section 13252(b) of the CA Code of Regulations: Unless destroyed by natural disaster, the replacement of 50 percent or more of a single family residence, seawall, revetment, bluff retaining wall, breakwater, groin or any other structure is not repair and maintenance under Section 30610(d) but instead constitutes a replacement structure requiring a coastal development permit.

modifications is essential because each case will further negatively impact coastal resources and public access.

Publicly monitoring the redevelopment status of these structures, with owners agreeing to that status in a binding way, helps mitigate negative impacts as the law allows. Specifically, a pre-Coastal Act structure that reaches the 50% redevelopment threshold becomes a replacement structure—new development—thereby losing its right to shoreline armoring under Coastal Act Section 30235.

Require MHTL Survey in Monitoring and Reporting

We suggest requiring applicants to include an updated MHTL survey showing where their revetment sits relative to public trust lands once there's reason to believe a shoreline protective structure has crossed the boundary, as appears to be the case here. This requirement could be added to Special Condition 4: Monitoring and Reporting, which already requires detailed monitoring reports to the Executive Director at five-year intervals.

The moss visible on rocks in the 2005 staff exhibit image suggests the revetment toe may already infringe on public tidelands. Moss only grows on rocks when they're consistently wet or submerged. The 2024 image, taken at higher tide, confirms this by showing the revetment toe underwater.



2005 Photo



2024 Photo

An updated MHTL survey showing the revetment is on public tidelands may not necessarily affect its status as a permitted structure, but it would allow the State Lands Commission to require a lease from the applicant if they choose. This would be a small step toward

compensating the state of California and its residents for negative impacts caused by private structures on public tidelands. Such information would also provide better understanding of where and when the public-private boundary is shifting, which could prove useful to the Commission and public.

Thank you for the opportunity to comment.

For our Ocean, Waves, and Beaches,

Mitch Silverstein
California Policy Senior Coordinator
Surfrider Foundation
msilverstein@surfrider.org
619.736.7757