



October 2, 2026

Delivered via email

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

Re: Item F11a, City of Pismo Beach LCP Amendment No. LCP-3-PSB-26-0026-1 (LUP Update)

Dear Chair Harmon, Commissioners, and Central Coast Staff,

Thank you for the opportunity to comment on the City of Pismo Beach Land Use Plan update. Surfrider supports the staff recommendation to approve the amendment with suggested modifications, and we support all five modifications. We commend City and Commission staff for a collaborative, multi-year process that has produced stronger protections for beaches, public access, lower-cost accommodations, and wetlands.

We particularly support Suggested Modification 1. Staff found that the two Addie Street parcels sit on backbeach dune directly adjacent to Pismo Creek, where development would raise problems with ESHA, coastal hazards, public access, and public views. Suggested Modifications 2 through 4 appropriately balance habitat protection with the Coastal Act's mandate to maximize public access.

The updated LUP also includes several provisions we want to recognize:

- Minimizing development on the sandy beach and reserving it for low-intensity recreation (Action LU-4.3b, Action COS-4.1h).
- Protecting public parking near beach access points, including changes to timing and pricing, and restricting parking revenue to access and recreation (Action LU-8.2c).
- Sizing lateral bluff-top access dedications to bluff retreat over the life of development with sea level rise, plus a factor of safety and additional width (Actions LU-9.3c, LU-10.1a, LU-11.1a).
- Designing public access facilities at Dinosaur Caves to be moved landward as the bluff erodes (Action LU-12.1c).
- Requiring lower-cost in-lieu fees to be spent within the City's own coastal zone (Action LU-4.2f), keeping lower-cost options where visitors, including many from the Central Valley, actually come to recreate.

With this foundation, we respectfully request for one targeted refinement to the LUP's interim hazard policies. It is intended to keep the LUP consistent with the Coastal Act while the City completes its Phase 2 Safety Element and Implementation Plan updates.

Action LU-8.3b (Assumption of Risk): Add a waiver of future shoreline protection and a removal requirement

We support Action LU-8.3b's deed-restricted acknowledgment of hazards, including that "adaptation strategies may be required in the future" and that approvals "shall not permit encroachment onto public trust land." We request adding two provisions that the Commission commonly applies to new shoreline development: a waiver of any right to future shoreline protection, and a commitment to remove or relocate development once it is threatened. Both are central to the rolling-easement approach described in the Commission's 2024 Sea Level Rise Policy Guidance (Strategy A.15), which calls for allowing beaches and wetlands to migrate landward as sea level rises.

Action LU-8.3c allows new development where complete avoidance of coastal hazards is infeasible, so long as it assures stability and minimizes risk. A recorded waiver ensures that this allowance cannot later become a basis for armoring that the LUP otherwise seeks to avoid.

Specifically, we ask that the following be added to the list of required acknowledgments (additions in bold):

9. That no shoreline protective device shall be constructed to protect the permitted development, and that the applicant waives, on behalf of itself and all successors and assigns, any rights to construct such devices that may exist under Coastal Act Section 30235;

10. That the permittee shall remove or relocate the permitted development, and restore the site, if it becomes unsafe for occupancy, if public agencies can no longer provide services to the site, or if any portion of it comes to encroach onto public trust lands.

We look forward to engaging on the City's Phase 2 update of the Safety Element and the Parks, Recreation, and Access Element.

The Pismo Beach LUP update is a meaningful step forward for coastal resource protection, and Surfrider supports its certification with staff's suggested modifications. The refinement above would keep the LUP's interim hazard policies consistent with the Coastal Act until Phase 2 is complete. Thank you for your consideration.

Sincerely,

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