October 30, 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: W14a Application No. 3-26-0524 (West Cliff Armoring, Adaptation, and Access, Santa Cruz)

Dear Chair Harmon, Commissioners, and Central Coast Staff,

Surfrider Foundation and Save Our Shores appreciate the City's work to reopen West Cliff Drive and its decision to move the road and path inland at 800 West Cliff Drive. That realignment is the kind of adaptation the corridor needs. We ask the Commission to strengthen the mitigation package so that it offsets the impacts staff has quantified, and to build more of that mitigation around retreat and beach restoration.

The record does not show the package offsets the impacts.

Staff's findings set a strong standard guided by the City's recently certified Beaches & Bluffs LCP chapter, namely that the armoring's unavoidable impacts "must be commensurately and appropriately mitigated" (Staff Report, p. 2). Staff then quantified those impacts through 2046 (pp. 39–45):

Impact	Quantity	Staff Valuation
Beach and shoreline area lost (footprint plus passive erosion)	42,800 sq ft, "nearly a full acre"	$18,018,800
Sand retained behind the armoring	5,400 cubic yards	$330,000
Total		**$18,348,800**

Staff finds that a fee in this amount "can commensurately mitigate for these impacts" (p. 45), then recommends an in-kind package in its place. We agree that a locally applied in-kind package is often preferable to an in-lieu fee that may sit unspent or deliver no benefit to the affected area.

However, the record contains no weighing or analysis of whether the package equals staff's $18,348,800 valuation or meets the standard staff applies. The City's new LCP, which staff calls "directly applicable" here, calls for "proportional mitigation for all unavoidable coastal resource impacts," with in-kind projects "commensurate to offset the access impacts identified" (Policy BB-12(d); Staff Report, pp. 28–29). The record gives no way to make that comparison:

- No item in the package carries a cost estimate or value.
- Riprap removal has no volumes. Exhibit 4 labels the sites "potential" riprap removal, with only a single boulder shown at Indicator surf break.
- Several items are commitments to study or seek funding: the water fountain ("pursue funding"), parking hours ("explore"), and the design guidelines (contingent on funding).

The sand impact deserves separate attention. Section 30235 allows armoring "when designed to eliminate or mitigate adverse impacts on local shoreline sand supply." No item in the package is directed at the 5,400 cubic yards of sand that staff estimates the armoring will keep from the shoreline through 2046.

To be clear, we are not necessarily alleging that the mitigation package is not commensurate, only that the record should show it meets the commensurate standard staff applies.

Requested changes

We ask the Commission to revise the conditions as follows.

1. **Require a phased realignment plan for the Lighthouse Field corridor, carried out through a follow-up CDP.** The 800 West Cliff realignment is a strong first step, and the record shows the City and State Parks are planning more retreat ahead. Relocation is the feasible, least environmentally damaging alternative where West Cliff Drive fronts Lighthouse Field, and the City has identified Its Beach as a further managed retreat site (Staff Report, p. 38). LCP Policy BB-6 already requires a West Cliff SAMP within five years of certification, including "phased adaptation sequences of action" and specific projects for "relocation of development and/or infrastructure" and "removal of armoring." Policy BB-7 includes specific provisions for public projects on West Cliff Drive, directing the City to “avoid the use of shoreline armoring to the maximum extent feasible.” It points to relocating West Cliff Drive “inland of or through portions of Lighthouse Field State Beach” as the alternative. The Commission should reinforce these commitments in this CDP so that each realigned segment sets up the next, starting with the one being permitted in this CDP. Riprap removal and realignment completed under this plan should be credited against the beach-area and sand impacts staff quantified, directly addressing the

sand-supply impacts that Section 30235 identifies. If realignment is not carried out, the City should compensate for any remaining shortfall against the impacts staff calculated.

We propose a special condition along these lines:

(a) By April 16, 2031, the Permittee shall submit a complete CDP application, or an application to amend this CDP, to implement a phased realignment of West Cliff Drive and the coastal trail along Lighthouse Field State Beach. The realignment shall extend from the 800 West Cliff Drive realignment through Its Beach and Lighthouse Point to Pelton Avenue. The application shall be based on the West Cliff SAMP required by LCP Policy BB-6, consistent with the provisions for public projects on West Cliff Drive in LCP Policy BB-7, and developed in coordination with California State Parks.

(b) The application shall identify a preferred alternative and an implementation schedule, which may be phased, and shall at a minimum address:

- *removal of riprap at Its Beach and restoration of the affected beach area;*
- *reconfiguration or relocation of the seaward parking lots upcoast of Its Beach, Lighthouse Point, and between Lighthouse Point and Pelton Ave.;*
- *how each phase connects to the 800 West Cliff Drive realignment and to later phases;*
- *triggers for each phase;*
- *cost estimates and funding sources.*

(c) Failure to meet this condition shall constitute noncompliance for purposes of Special Condition 11(f).

Staff also notes that the City is "taking the necessary steps" to advance managed retreat near Getchell Street (p. 38). We ask for clarification on what those steps are and when they will occur.

2. **Require progress reporting on the remaining commitments.** The water fountain (Special Condition 1(h)) and expanded parking hours (Special Condition 1(g)) are commitments to pursue funding and to coordinate with State Parks, with no timeline. The City should report on progress for both by November 30, 2027, alongside the enhancement lists required by Special Conditions 4 and 5.

West Cliff Drive offers a mixed bag of adaptation options, with very limited choices along much of the corridor and a clear, viable path for retreat at Lighthouse Field. The mitigation for this project should match the impacts staff has documented and lean on the retreat and beach restoration the City has already started. Our proposal is a modest ask because it matches what the City has already committed to in LCP Policies BB-6 and BB-7. An LCP planning deadline carries no consequence if it is missed,

however, and a CDP condition does. Making the Lighthouse Field realignment part of the mitigation for this project's armoring closes that gap and gives the Commission leverage to keep the City on the beach-preserving path its LCP lays out.

Thank you for considering these comments.

Mitch Silverstein
California Policy Senior Coordinator
Surfrider Foundation

Katie Thompson, M.M.A
Executive Director
Save Our Shores