



Honorable Henry Stern, Chair
Senate Natural Resources and Water Committee
California State Capitol, Room 5046
Sacramento, CA 95814

March 25, 2021

RE: SB 627 (Bates) – OPPOSE

Dear Senator Stern,

We write to you in strong opposition to SB 627 (Bates), which would pave the way for private property owners to effectively hasten and accelerate the loss of public beaches along the entire California coast under the guise of claiming to improve public safety.

Approximately 86 percent of California's coastline is eroding due to naturally occurring geologic processes – in fact, natural erosion and sediment transfer is what beaches rely on for their very existence. Meanwhile, sea level rise is now predicted to cause nearly 70 percent of Southern California's beaches to disappear by 2100. Further, it is well-documented in the scientific literature that sea walls and similar hard structures result in the loss of sandy beaches:

“A common perception is that seawalls and revetments protect the coast. Although such armoring structures may temporarily protect property from encroachment by the sea, they accelerate erosion of existing beaches and coastal habitats in the areas where they are located, limit beach access, and impede coastal recreation. Scientific evidence shows that coastal armoring structures prevent coastal ecosystems from migrating inland and cut off sand supply by preventing natural erosion processes. Put simply, when placed on an eroding or retreating beach, armoring structures will cause that beach to narrow and eventually disappear. Wave energy reflecting off of shoreline armoring structures also undercuts the beach and can hasten coastal erosion in front of the structure as well as on neighboring properties, harming those properties and stimulating yet more armoring. In short, many of California’s beaches, and the amenities and ecosystems they provide, may inevitably disappear due to armoring.”

– Molly Loughney Melius, Fellow, and Margaret R. Caldwell, Director, Environment and Natural Resources Law & Policy Program, *California Coastal Armoring Report – Managing Coastal Armoring and Climate Change*

Excessive armoring has already resulted in the narrowing of beaches along much of the California coastline. **Fast-tracking additional hard armoring – including seawalls and bluff infill – will drastically speed up erosion and beach loss leaving the public with nothing but memories of sandy shores.**

The Coastal Act was passed in 1976 well before the issue of sea level rise became apparent. However, the Act did anticipate that seawalls and hard armoring would have a deleterious effect on the future of California’s iconic beaches. Realizing that the State should not penalize those who had already built structures prior to the Act’s approval, it mandated that all “existing structures” built before the Coastal Act became effective on January 1, 1977 be allowed to apply for a seawall if the existing structure were in imminent danger. However, Coastal Act Section 30253 requires that “new development...assure stability and structural integrity, and neither create nor contribute significantly to erosion...or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.” The Commission has long applied this policy to implement appropriate bluff-top and shoreline setbacks for new development.

Such setbacks are based on an assessment of projected erosion and related hazards at the site for the life of the proposed development and help ensure that seawalls and other protective devices that could lead to adverse impacts would not be necessary in the future.

California’s beloved coast and the recreational, ecological and economic benefits it provides for all visitors to it, must be preserved for the public to whom they belong. If we prioritize both public access and public safety in planning to adapt to sea level rise, the obvious solutions come in the form of living shorelines, soft armoring techniques, relocation of development within coastal hazard zones and by instituting managed retreat programs. Proactive non-structural solutions

are typically more cost-effective over the long term and less environmentally damaging than reactive responses.

SB 627 goes directly against all recent state agency guidance which emphasizes protection of coastal resources and the public trust. Planning for sea level rise will require multiple policies and phased approaches. SB 627 would have us lock ourselves into the one method we know is sure to fail and result in the accelerated loss of our beaches.

Finally, when it comes to public safety and the prevention of the sort of tragic loss of life we've seen in recent years, the true solution is to prioritize preservation of our beaches. Hard armoring of coastal bluffs actually increases the risk to the beachgoing public. The [California Coastal] Commission does not agree that bluff retention devices provide any quantifiable public safety benefit and therefore, this contention is not a valid reason to offer mitigation reductions for the impacts of shoreline armoring.

Passive erosion and loss of usable beach area is a direct result of shoreline armoring and can decrease the safety of a beach as areas of safe passage are reduced or eliminated. In addition, even with shoreline protection, there is no guarantee that a seawall or the bluff above a seawall will not fail and result in death or injury to beach users.

For all the reasons above, the undersigned, representing hundreds of thousands of Californians, oppose SB 627.

Sincerely,

Jennifer Savage
California Policy Manager
Surfrider Foundation

Nick Jensen
Conservation Program Director
California Native Plant Society

Andrea Leon-Grossmann
Climate Action Director
Azul

Andria Ventura
Legislative and Policy Director
Clean Water Action

Susan Jordan
Executive Director
California Coastal Protection Network

Elizabeth Dougherty
Executive Director
Wholly H2O

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Nikita Koraddi
CA Legislative Advocate
Natural Resources Defense Council

Lauren Cullum
Policy Advocate
Sierra Club California

Linda Krop
Chief Counsel
Environmental Defense Center

Pamela Flick
California Program Director
Defenders of Wildlife

Susan Stephenson
Executive Director
CA Interfaith Power & Light