



May 8, 2026

Delivered via email

To: Meagan Harmon, Chair, California Coastal Commission  
CC: Kate Huckelbridge, Executive Director, California Coastal Commission,  
Steve Hudson, Deputy District Director, South Central Coast District

**Re: W14a-b, Application Nos. 4-23-0791 and 4-25-0159 (City of Ventura, Surfer's Point)**

Dear Chair Harmon, Commissioners, and South Central Coast Staff,

Thank you for the opportunity to comment on the City of Ventura's applications to formalize emergency armoring and drain repairs to the beach promenade, place additional armoring, and replace the beach access staircase, among other promenade improvements.

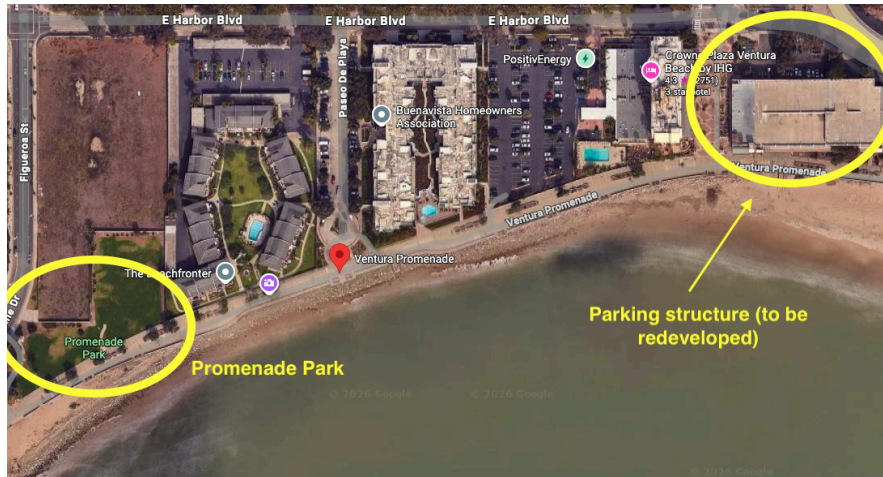
Surfrider has voiced concerns about riprap placement at this site since 2001, when the City circulated environmental documents supporting a Negative Declaration for riprap eventually placed in 2011. Among our comments at that time: "we are concerned that the Negative Declaration does not adequately consider impacts to public beach access and recreation associated with the rock revetment and new stairs." Fifteen years later, history has proved us right. The beach continues to erode, dislodged riprap takes up ever more beach space, and the staircase and promenade foundation are hammered at high tide – necessitating emergency repairs and, now, additional armoring. This cycle of armoring and beach loss continues with no long-term plan, and it is happening steps away from the Surfer's Point managed retreat project, the gold standard in sustainable coastal adaptation.

Surfrider opposes continued armoring that degrades and destroys the public beach. We are also concerned that no mitigation is required for the armoring's adverse impacts to local shoreline sand supply. Rather than impose compensatory measures, the conditions rely on a 10-year planning horizon to address those impacts. We flag this as unusual leniency, and urge that the long-term hazards management plan required for renewal include a detailed accounting of cumulative beach loss attributable to the revetment and evaluate what compensatory measures are feasible at that time. The staff report acknowledges that the City's own consultants identified approximately 900 linear feet of revetment requiring proactive attention — these CDPs cover 600 linear feet. Additional armoring requests for the remaining footage may come before the Commission within this permit's 10-year authorization period, and any such applications should be held to the same planning standard Special Condition 1 establishes here, not treated as a fresh start with a new timeline.

We also urge the Commission to resist issuing additional emergency permits along this stretch of promenade. The Coastal Act limits emergency authorization to genuinely unforeseen situations, but recurring wave damage to this structure is well-documented and now explicitly anticipated by the City's own engineering consultants. At least one prior emergency revetment placed following the 2016 El Niño has never been finalized through a follow-up CDP. Emergency permits should not become a mechanism for incremental armoring that bypasses the planning standards this CDP works to establish. Future storm damage along this stretch of promenade is a predicted consequence of maintaining hardened infrastructure on an eroding shoreline, not an unforeseen emergency. It should be treated as such.

We do support binding these CDPs to a limited authorization period that requires the City to produce a long-term hazards analysis and management plan, including an analysis of feasible alternatives for future adaptation. However, we urge the Commission to strengthen Special Condition 1 to require meaningful public participation at multiple points over the 10-year permit period. The same requirement should apply to the Beach Management and Adaptation Plan (BMAP) itself, which Special Condition 1's long-term management plan must harmonize with. The BMAP will shape the range of alternatives the City considers for the long term; public input during its development is essential to ensure that community concerns and priorities (including those Surfrider has raised for over two decades) are heard, recorded, and considered.

We offer the following observations regarding opportunities for adaptation that both the long-term hazards management plan and the BMAP should examine. The promenade in this area is mostly backed by private structures, limiting the City's and Commission's direct influence. However, the parking structure and Promenade Park flanking this CDP site are city-owned assets. The City is actively seeking to redevelop the parking structure site, and that redevelopment should include setbacks sufficient to accommodate realignment of the promenade and prevent further beach loss. Proposals [received](#) to date (all large hotel complexes with no additional setbacks apparent) appear to fall short in that regard. Promenade Park similarly affords space for landward migration. Unlike the beach, and to a lesser degree the promenade itself, the grassy park is not a coastal-dependent resource, and the Coastal Act prioritizes coastal-dependent uses. The property lines of the adjacent hotel and multiunit complexes should also be examined for potential realignment opportunities. Even the promenade itself – which is far wider than most beach boardwalks in Southern California – could be narrowed where necessary to recover beach space.



**Circles depict City-owned assets where retreat could be most easily integrated into a long-term plan**

Regarding the staircase replacement: when planning the 2011 riprap, the City initially proposed relocating the staircase approximately 150 feet down the beach to a less eroded and safer location. Given that the existing staircase is subject to regular wave attack in its current position, that option merits reconsideration. At minimum, the replacement staircase should be conditioned to be located landward of the existing one, not merely prohibited from extending further seaward as Special Condition 2 currently requires. While the proposed staircase features an improved design, landward realignment offers a small opportunity for adaptation now as opposed to holding the line at the existing, unsustainable footprint. Finally, final plans for the replacement should ensure sufficient concrete thickness on the leading edge to withstand wave attack over the structure's expected life.

In summary, Surfrider respectfully requests that the Commission: strengthen Special Condition 1 to require public participation at multiple points during both the long-term hazards management plan process and the BMAP development; require that any renewal plan include a cumulative beach loss accounting and evaluation of compensatory measures; condition the staircase to be landward of – not merely level with – the existing structure; and ensure final staircase plans address structural durability at the leading edge. We appreciate the Commission's consideration of these requests.

*For our Ocean, Waves, and Beaches,*

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