

California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

Re: Children’s Pool Beach Closure, CDP # 6-14-0691 and Rope Barrier, CDP # 6-15-0223 permits.

The La Jolla community, through a vote of the majority of Trustees of the La Jolla Community Planning Association, opposes the renewal of CDP # 6-14-0691 & CDP # 6-15-0223. These Coastal Development Permits should not be renewed without requiring the intended implementation of existing permit conditions. These permits would be contrary to local community standards contained in the La Jolla Community Plan. The Commission should require additional performance benchmarks on the City’s permits with the goal of actually improving sand and water quality and better beach access for disabled visitors.

The conditions for the beach closure permit CDP # 6-14-0691 are:

“During the five year [permit] period the City shall”:

1. “Examine the feasibility of ADA access.”

The Children’s Pool beach access ramp is identified as public access in the LCP. The City opposed a disabled swimmer’s request seeking reasonable accommodation to use the existing beach access ramp at Children’s Pool. A lawsuit was filed but later withdrawn because of a ruling in a separate case. The City spent more resources fighting against improved access for the disabled than it would have to restore and reopen the ramp as a reasonable accommodation for the disabled and public use.

The City has not complied with their own development permit requiring emergency vehicle access to the beach when they built the new lifeguard tower at Children’s Pool, CDP NO. 549686. The City permanently barricaded the beach access ramp with an unpermitted concrete barrier across the ramp.

2. “Examine water quality and determine any method to improve it.”

The City has not met State water quality standards at Children’s Pool for decades because they have taken no action to reduce the seal waste overload on the beach. In August 2018 new County Health Dept. warning signs were posted along the rope barrier indicating a worsening of water quality at the Children’s Pool. The “temporary” advisory signs remained until the beach closure in December 2018.

3. “Analyze the quality of the sand and determine a method for improving it.”

Two decades of seal waste accumulation on Children’s Pool Beach has negatively impacted water and sand bacteria levels. Regular cleaning at the beginning of the summer would greatly reduce the addition of bacteria into the water and sand. The City refuses to clean the beach as was done in the past and has threatened prosecution of volunteers who conducted beach clean-up events in the past.

Long term renewal of the current permits will foreclose on any discussion of alternative ways to provide for better access while protecting wildlife. A balanced management plan with defined improvement

goals over a one or two year period should be considered instead of meaningless studies and before a long term permit renewal.

Children's Pool Rope barrier CDP # 6-15-0223

The rope barrier blocking access across 152 feet of a 155 foot wide beach is an encroachment on an established physical access way to the shoreline in violation of the Coastal Act. A summertime rope barrier cannot be justified or permitted to remain in its current form. Any restrictions to access must be made to change with changing conditions every day. A City Ranger was hired and should be used for this specific purpose.

Two decades ago, the City refused to follow NOAA/NMFS recommendations to discourage harbor seals from establishing a colony on Children's Pool Beach. This has led to polluted sand and water and beach closures. This represents a degradation of coastal access protections in the Coastal Act.

Please reject the City's application for beach closure permit extensions without intended improvements. This will lead to better beach management policies that accommodates all users of the beach. Beach closure is an extreme measures which encourages colonization by more seals at Children's Pool and nearby beaches. This will only lead to more demands for more closed beaches as popular urban recreational beaches are occupied by the growing seal population. This is of great concern to anyone wanting to maintain and improve coastal access in La Jolla.

Sincerely,

Bob Steck, President
La Jolla Community Planning Association