



March 3, 2013

Joanne Ginsberg  
Enforcement Analyst  
California Coastal Commission  
VIA EMAIL [jo.ginsberg@coastal.ca.gov](mailto:jo.ginsberg@coastal.ca.gov)

**Re: Seawall Renovation at Sharp Park**

Dear Ms. Gingsberg:

Surfrider Foundation is a non-profit 501 (c) (3) organization that is dedicated to the protection and enjoyment of oceans, waves and beaches through a powerful activists network. Surfrider Foundation San Francisco Chapter has been actively involved in the campaign to Restore Sharp Park. The Chapter has been especially engaged on coastal management issues, such as the future management of the seawall and the seawall's effect on coastal resources in this area.

According to the October 2, 2012 Biological Opinion of the U.S. Fish and Wildlife Service regarding Formal Endangered Species Consultation on the Sharp Park Safety, Infrastructure Improvement, and Habitat Enhancement Project in San Mateo County, California:

“During and following completion of the Project, the SFRPD shall maintain and keep in good repair the sea wall road, which provides the only vehicle access for maintenance activities as described above. Maintenance of the roadway on the sea wall is expected to include filling ruts in the surface with aggregate or comparable materials and repairing drainage issues by outsloping the roadbed. The SFRPD does not anticipate hardening or further armoring of the sides of the sea wall.” (at p.CCSF100655, emphasis added)

Surfrider Foundation and the public at large have been under the impression that no major construction, including expansion or further armoring, would take place on the Sharp Park seawall. However, due to the renovation of the seawall on February 23 through February 25, 2013, it appears as though the City authorized the expansion of the seawall outside of and in addition to the original building envelop. The local newspaper reported that 75 tons of “chert” rock was used on the seawall, and the attached pictures show what appear to be new armoring at the site. This type of work exceeds any reasonable definition of “maintenance”. “Maintenance” excludes new work or changes in the original extent or fill of design. It appears that new boulders were placed on the beach-side of the seawall at Sharp Park where none had been previously located. This type of beach armoring requires a permit procedure with formal agency evaluation, as well as public notice and comment period.

The Surfrider Foundation asks for the California Coastal Commission to do a full investigation of this issue to determine if unpermitted development did occur on this site. If so, we ask that the Coastal Commission require a permit for such work and afford the public their right to comment on this important issue.

Sincerely,

/s/

Angela T. Howe, Esq.

Legal Director

Surfrider Foundation

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