

July 10, 2012

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

RE: CDP Application No. 2-11-024 (City of Daly City) Additional Coastal Armoring at Mussel Rock Landfill

The Surfrider Foundation respectfully urges the California Coastal Commission to deny approval of the City of Daly City's Application No. 2-11-024

This project seeks to justify and build upon the Daly City Department of Public Works' strategy of using rock revetments for erosion control at Mussel Rock. By maintaining a policy of armoring the public will remain deprived of this stretch of beach including lateral access and its native aesthetics. Sediment transport processes will continue to be altered as will natural ecosystems. Garbage from the landfill will continue to be located in a hazardous area prone to beach and bluff erosion as well as seismic activity. In short, the challenges at Mussel Rock will remain unaddressed and postponed once again.

The primary reason for granting this permit is to prevent a scenario in which waste from the landfill enters the ocean. However, by supporting the continual location of a landfill in this area, the threat to water quality remains – and this is a substantial issue. History has shown that revetments and other hard coastal armoring structures are commonly prone to failure (In fact, this permit is being sought due to the failure of the armor that is already at the site). The coastline at Mussel Rock is in a high energy environment. At any time the right winter storm can undo any of the protection the new armor may afford.

The only responsible policy for Mussel Rock is a strategy of landfill relocation. Unfortunately, the Commission's staff report has agreed with Daly City's contention that the cost of a relocation strategy is prohibitively expensive. According to the report, cost was cited twice before as a reason to not relocate this landfill (1977 and 1999). Presently, an estimate of \$125 million dollars is given for removing the whole site, but that figure is derived from the 1999 estimate of \$90 million, not a recent formal comprehensive study. While relocating the entire landfill would be costly, a strategy of gradual relocation could be a more feasible approach. We believe there should be a thorough study of this alternative.

In summary, by approving this permit as it is currently written, the status quo at Mussel Rock remains. A truly sustainable solution like managed retreat is not considered. An incredibly beautiful stretch of beach remains submerged. Ecosystems and natural processes continue to be altered, and waste from this site will remain a threat to near shore water quality.

For these reasons, we respectfully urge the Commission to Deny the City and County of San Francisco's Application No. 2-11-024.

A handwritten signature in black ink, appearing to read 'Bill McLaughlin', with a long horizontal flourish extending to the right.

Bill McLaughlin
Surfrider Foundation, San Francisco Chapter
Erosion Committee Project Manager
415-225-4083
<http://www.sloaterosionob.blogspot.com>