



March 6, 2020

To: Steve Padilla, Chair, California Coastal Commission

CC: Jack Ainsworth, Executive Director, California Coastal Commission
Ryan Moroney, District Supervisor, California Coastal Commission

Re: Item W22c, Application No. 3-20-0088, the City of Santa Cruz Beach Management Plan

Dear Chair Padilla:

The Surfrider Foundation is a 501(c)(3) grassroots environmental organization dedicated to the protection and enjoyment of the world's ocean, waves, and beaches for all people. The Surfrider Foundation Santa Cruz Chapter (Surfrider SC) represents hundreds of members, volunteers, and supporters working to protect coastal and marine resources in Santa Cruz.

Surfrider SC appreciates that the City of Santa Cruz is making efforts to curb its substantive issue of homelessness, but we also strongly urge the Commission to deny the City of Santa Cruz's coastal development permit and Beach Management Plan that would implement a midnight-to-one-hour-before sunrise curfew and closure of the dry sand areas on both Cowells and Main Beach. While we understand that the intention of this ordinance is to reduce beach degradation and increase public safety the outcome will be the opposite. A beach curfew will not only impede public access but also disproportionately and unjustly impact the homeless and unsheltered individuals who might look to sleep on the beach at night. Homelessness is a statewide issue and dealing with it by closing public beaches sets a terrible precedent for the rest of the state. Santa Cruz is not the only local government that has or will attempt to address homeless issues by issuing beach closures. **Crimes should be dealt with as such; but we must not criminalize sitting or lying on the beach at any hour.**

To enforce a limit on what time people can access the public beach in Santa Cruz would not only be contrary to the letter and spirit of the Coastal Act, but would be a loss for Santa Cruz County residents and the millions of visitors who seek enjoyment at Cowells or Main Beach each year, regardless of their social status or the purpose of their beach visit. If passed, this new ordinance will create an undue burden to disadvantaged members of the community while only addressing a small symptom of the larger issue of homelessness. We feel that there are better ways to deal with homelessness that are more just, and as the California Coastal Commission has informed the City in the past, the law would illegally deny public access to the coast guaranteed to all residents and visitors by the California Coastal Act and the state constitution.

We urge the Commission deny the City of Santa Cruz's proposed beach management plan unless it removes the beach curfew and limited coastal access hours. This ordinance seems to be solely for the purpose of discouraging homeless individuals from sleeping on the beaches; it is



not a viable solution to increase public safety and reduce beach degradation, and it will only serve to redistribute the issue it aims to alleviate. In a state with increasing population and skyrocketing housing costs, homelessness will continue to be a significant social issue throughout California. Instead of coming at this problem sideways and in disregard of the Coastal Act, we encourage the City to address the root causes of homelessness instead of passing ordinances designed to move homeless people out of sight of the public. The City of Santa Cruz has a moral and practical imperative to take care of all its residents, and while we are pleased to see the City following the directive of the Coastal Commission by applying for a coastal development permit, we ask that the City support the Coastal Act while seeking true solutions to the social problems faced.

Sincerely,

Sam Blakesley
Chapter Member
Surfrider Foundation
Santa Cruz Chapter