



January 26, 2021

To: City of Carlsbad City Council
City of Carlsbad
1635 Faraday Ave.
Carlsbad, CA 92008

Re: Agenda Item #12, Planning Area F Poinsettia Shores Master Plan

Dear City of Carlsbad City Council,

The Surfrider Foundation's San Diego Chapter (Surfrider San Diego) appreciates this opportunity to provide comments on Item #12, a report on Planning Area F of the Poinsettia Shores Master Plan — Ponto Property. Surfrider San Diego is a nonprofit environmental organization that engages a vast volunteer network of ocean users to protect the ocean, waves, and beaches.

We are involved in Local Coastal Program updates throughout the region and have been focused specifically on the City of Carlsbad's LCP Update, including its Sea Level Rise Vulnerability Assessment, since 2018. Through this process we are seeing how the combined pressures of sea level rise and city planning decisions are squeezing out our public beaches and damaging coastal resources. In light of these historical and persistent trends and the anticipated impacts of sea level rise that are specific to Carlsbad's Southern Shoreline, we would like to take this opportunity to urge the City Council to **consider the Ponto Property as a public use area that can provide a rare and critical opportunity for upland relocation of the South Carlsbad State Beach Campground in the future.**

The area in consideration at Ponto is the last large undeveloped parcel of land in Carlsbad. Undeveloped land within .1 miles of the San Diego coastline is rare, and this area in particular is in close proximity to the Carlsbad State Beach Campground, South Ponto Beach, and the Batiquitos Lagoon. All three of these areas provide important coastal access and coastal recreation opportunities; which are protected by the Coastal Act. Unfortunately, the City's 2018 Sea Level Rise Vulnerability Assessment reveals that all three of these resources face significant threats due to sea level rise in the near future. In particular, the campground is expected to become severely impacted by the end of the century:

" In 2100, bluff erosion of South Carlsbad State Beach day-use facilities and campgrounds become more severe and the South Ponto State Beach



day-use area becomes exposed to coastal flooding during extreme event. (pg 25, Vulnerability Assessment¹)”

While the City must develop adaptation plans to address these impacts, the reality is that the campground has nowhere to go. The City’s current Local Coastal Program Update Draft Document does not include any scenario-based adaptation planning, despite the fact that this document is specifically intended to prepare the city for sea level rise. By the time the city does consider adaptation planning for sea level rise, either through an LCP Implementation Plan Update, a Zoning Ordinance, or other adaptation planning mechanism, valuable time for planning will also have been lost — sea level rise is already increasing and set to increase at an alarming rate in approximately thirty years².

As Surfrider detailed in a letter to the City’s Planning Commission in 2019³, preserving a coastal park at Ponto would ensure access and recreational opportunities for generations of people in Carlsbad and North County to access Ponto Beach, a popular beach destination that is used by many for surfing, swimming and coastal recreation. This land is one of very few remaining open space areas along the coast in San Diego County and Surfrider supports preserving this space for future Coastal Dependent uses such as viewing areas, walking trails and campgrounds. Surfrider believes that any future plans for a Ponto Coastal Park and zoning must be primarily oriented for beach and coastal uses only, including any additional parking and transit developments.

Surfrider opposes any development of this space, such as residential development, that would impede beach use, including but not limited to blocking shoreline access, interrupting public views, creating increased traffic or strains on available parking, or other similar conflicts. This includes, but is not limited to, the development of the space for housing, non-coastal oriented retail shops, or an active park primarily dedicated for organized sports (baseball, football, lacrosse, etc.), that would compete for space with those wishing to visit the beach for coastal dependent activities. High-density residential use would essentially eliminate the area’s adaptability and would be costly to move should the need arise as the coastline changes from sea level rise impacts.

Surfrider recognizes the challenges involved in considering land use at Ponto. The Staff Report⁴ for today’s council meeting makes an error however, in not mentioning

¹ <https://www.carlsbadca.gov/civicax/filebank/blobdload.aspx?BlobID=33958>

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https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-009_SanDiego_AD_A.pdf

³ <https://drive.google.com/file/d/1831prFuMr1xt9Ar0TF0bRBou7be9q9ut/view?usp=sharing>

⁴ <https://cityadmin.carlsbadca.gov/civicax/filebank/blobdload.aspx?BlobID=46657>



sea level rise as a primary consideration needed to be analyzed in this decision-making process. We would like to remind the city of the established policies that currently support the City in considering this land as a preserved space for upland relocation of the campground:

Coastal Act Section 30233 states:

“Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible. (Coastal Act, Section 30233)”

The Coastal Commission’s Sea Level Rise Guidance⁵ also specifically recommends planning ahead to replace loss of access and recreational areas, in some ways by protecting open space:

B.2 Plan ahead to replace loss of access and recreation areas: Identify replacement opportunities or otherwise plan ahead for how to replace recreation areas and accessways that will be lost due to inundation or damage associated with sea level rise. An LCP could designate and zone lands for this through, for example, a phased overlay or other regulatory measures that ensure that access and recreational areas are available in the future. Local governments may choose to provide additional incentives to encourage creation of new recreation areas or opportunities. Such incentives could include grant for protection new recreation areas or tax breaks for recreation related businesses.

B.2a Protect existing open space adjacent to the coast: Plan for future coastal recreational space and parkland by protecting open space adjacent to coastal habitats so that beaches and other habitats can migrate or so that there is open space available as parkland or other areas are lost.” (page 145, Sea Level Rise Guidance)

Additionally the City’s Sea Level Rise Vulnerability Assessment describes “The Retreat Approach,” as an adaptation strategy for future consideration:

“These strategies include creating land use policies and zoning regulations that **encourage building in less hazardous areas and the gradual removal and relocation of existing development as it becomes threatened or damaged.** There are a variety of mechanisms to implement this approach including: acquisition and buy-out programs, transfer of development rights programs and removal of structures where the right to protection was waived (i.e., via permit condition). Other retreat strategies include use of conservation easements or rolling easements that limit or prohibit development in order to

⁵ <https://www.coastal.ca.gov/climate/slrguidance.html>



allow coastal erosion processes to occur into upland property; as well as hazard overlay zones that require all properties within the zone assume the risk of being in a hazardous environment, and identify triggers indicating when development needs to be relocated.” (page 31, Vulnerability Assessment)

In conclusion, we urge this Commission to consider these approaches and today's workshop as an opportunity to preserve Ponto as a valuable space facilitating coastal recreation, as well as a rare opportunity to preserve the South Carlsbad State Beach Campground in the future.

Sincerely,

Laura Walsh

A handwritten signature in black ink that reads "Laura Walsh". The signature is written in a cursive, flowing style.

Policy Manager
Surfrider Foundation San Diego County Chapter