



July 26, 2021
Delivered via email
To: Del Mar City Council

Re: Item 2 - Presentation by SANDAG on Del Mar Bluff Stabilization Project

To the members of the Del Mar City Council —

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches for all people, through a powerful activist network. The Surfrider Foundation San Diego County Chapter has more than 2,300 members, many of whom enjoy Del Mar's coastline. Bluff stabilization of the Del Mar section of the LOSSAN corridor railroad tracks will have significant impact on the city's coastline and coastal access, and we submit the following comments related to SANDAG's proposed stabilization efforts.

Extreme bluff stabilization measures should be avoided to the extent possible

As we pointed out in our comments on Item 15 of today's City Council agenda, SANDAG's proposed bluff stabilization measures will have an extreme impact on the public's beach. SANDAG has maintained that its Del Mar Bluffs Phase 5 and 6 proposals, which include the construction of a contiguous seawall from 15th street to Sherrie Lane, have been designed to stabilize the bluffs for thirty years, until approximately 2050. The timeline for track realignment however, has newly been accelerated where an operable inland track could exist by 2040.

Given this accelerated timeline, Surfrider urges SANDAG not to erect beach destroying seawalls that will outlast their useful need in protecting the track in its current position. To this point, Surfrider strongly recommends that the City Council work with SANDAG to ensure that hard armoring is only erected where necessary to ensure safety of the track as long as it is operated.

We recommend that the City requests SANDAG to commit to reevaluating the Del Mar Bluffs Phase 6 (DMB6) proposal in three years, based on updated information about the alignment alternative selected and its completion timeline. DMB6 is not scheduled to be initiated until 2026, so postponing DMB6 proposals until 2024 would allow the agency time to reevaluate its hard armoring plans and update the appropriate permit applications.



Additionally, the lifetime of the seawalls should be tied to their benefits to the track in its current location. Every year that the seawalls exist, they will take up the public's beach space, block coastal access, and erode the public beach. Bluff toe stabilization permitted and financed for the purpose of ensuring track safety should not be allowed to continue negatively impacting the public beach and bluffs beyond the track's operable lifetime. For this reason, we also urge the City Council to work with SANDAG to ensure that bluff stabilization infrastructure is removed as soon as possible and to earmark funding for seawall removal.

Significant bluff stabilization activities warrant significant mitigation efforts

DMB5 and DMB6 include the construction of a contiguous seawall, as well as extensive trenching and regrading of the bluffs. The impacts to the coastline through erosion and coastal access will be enormous. Mitigation should be equally and inversely impactful. In making mitigation determinations, Surfrider strongly urges the City to thoroughly review SANDAG's erosion rate calculations. Surfrider has seen how erosion rates can dramatically differ across permit applications related to coastal development along Del Mar's bluffs. In this case, a first step in reviewing the relied upon erosion rates would be to ensure that the same erosion rates SANDAG is using to justify the need for bluff stabilization efforts in the first place are also used as a foundation for mitigation calculations.

Mitigation should be in the form of projects, with safe crossings incorporated

Not all mitigation is created equal. In order to ensure that mitigation is tangible and provides the most benefits to Del Mar and to beachgoers, Surfrider recommends that SANDAG include mitigation project proposals as part of its DMB5 federal consistency application to the California Coastal Commission. Given the enormous impact of this project to the public beach and coastal access, the City of Del Mar should expect tangible and timely beach and public access benefits as mitigation for the stabilization activities. As the entire Southern part of the City's bluffs undergoes construction, The City should not merely accept fees with no real plans to direct that mitigation funding to projects. SANDAG's proposals should be project specific, and they should be reviewed as part of the Coastal Commission's federal consistency



determination on this project so that the public and the City of Del Mar have the appropriate opportunity to participate in the project selection process.

Surfrider also understands that NCTD is proposing to erect a fence along the Del Mar bluffs that will effectively blockade countless special coastal access spots in the City. We echo calls from the community that NCTD should work with the City to establish safe crossings, and request that this be considered as a form of mitigation for bluff stabilization projects.

We recognize that SANDAG, the North County Transit District (NCTD), and City of Del Mar are working on a Coastal Connection Study to evaluate project-based mitigation options for coastal access disruptions to the City, and that this study is set to be completed in 2022. Surfrider urges the City Council to question whether this study timeline can be accelerated or whether the federal consistency determination can be postponed in order to enable appropriate public review of tangible mitigation options that will support coastal access.

Conclusion

The City of Del Mar is facing tandem proposals to fence off the top portion of its bluff and wall off the bottom. The City's ability to affect and influence these proposals will shape coastal access for the current and next generation in Del Mar. We strongly encourage the City Council to avoid beach destroying stabilization measures to the extent possible, particularly by tying interim stabilization measures to the lifetime of the tracks in their current location. Where this cannot be done, meaningful steps towards real project-based mitigation must be pursued through the process of permitting stabilization measures.

Sincerely,

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