



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

Re: Item 15 - City Council Discussion Regarding SANDAG's San Diego Regional Rail Alignment Study

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. Realignment of the Del Mar section of the LOSSAN corridor railroad tracks and interim bluff stabilization measures will have significant impact on the city's coastline and coastal access. We submit the following comments and questions related to the San Diego Association of Government's (SANDAG's) Conceptual Engineering and Feasibility Analysis for the City Council's consideration.

Question 1: Are the full extent of the extreme measures proposed in Del Mar Bluffs Phase 5 (DMB5) and Del Mar Bluffs Phase 6 (DMB6) stabilization efforts necessary, given the expected accelerated timeline of track relocation?

In previous City Council meetings, SANDAG has proposed extensive stabilization measures from the bluffs at 15th Street to the Southern end of the City (See also Del Mar Buff Stabilization Update: Item 2 Attachment A in this meeting's staff report.) Even before mitigation for this work is considered, the extensive armoring and grading of Del Mar's bluffs should be scrutinized and avoided where possible, given the severe impacts that such activity will have to the public beach through the occupation of beach footprint and accelerated erosion of the beach.

SANDAG has maintained that its DMB5 and DMB6 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. The timeline for track realignment however, has newly been accelerated; with the recently reappointed Director of SANDAG having publicly stated numerous times a belief that the agency could be breaking ground on an alternative alignment within ten years, with a functioning alternative operating by approximately 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 ask SANDAG to provide flexibility in adjusting its DMB6 proposals to be modified in three years, based on the alternative alignment selected and relevant timeline for operation. DMB6 is not scheduled to be initiated until 2026, so postponing DMB6 proposals until 2024 would give the necessary time to both apply for DMB6 permits and reveal updated alignment plans.

Question 2: How will the completion of the new track alternative be tied to the lifetime of bluff stabilization measures?

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 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.

Question 3: What will the overall impact of realignment be to the San Dieguito Lagoon, and what will be the consequential mitigation?

Surfrider understands that SANDAG will be analyzing two alignment alternatives in-depth through an Environmental Impact Statement process. The San Dieguito Lagoon is a rich state marine conservation area, which provides critical nesting habitat for sensitive bird species and a tremendous diversity of plant and animal species. While SANDAG has pledged mitigation for damages to the lagoon, intact ecosystems are high value systems due to their extensive benefits for overall habitat health and resilience. We encourage the City of Del Mar to work with SANDAG to understand the total impact of the alignment project to the lagoon, particularly through the lens of the Governor of California's 30x30 executive order, which seeks to conserve 30% of the state's lands and waters by 2030. This legislation is premised on conserving existing ecosystems that have high carbon carrying capacity — with



lagoons and wetland ecosystems known to be some of nature's best carbon sequesterers.

Conclusion

We remind the City Council that relocation of the tracks is a primary example of the need to relocate infrastructure in order to respond to known sea level rise risks in Del Mar. Though the proposals surrounding bluff stabilization and realignment that the City is facing today are treated with the severity of emergency measures, the corridor's severe vulnerabilities related to sea level rise and erosion have been known for decades. As recently as 2018, SANDAG continued to propose alternatives for stabilizing the LOSSAN corridor by tunneling in place on the edge of eroding bluffs — this kind of thinking is a form of climate denial that will lead the City time and again into destructive emergency responses to climate trends like sea level rise.

We encourage the City Council to acknowledge this upfront in the conversation around both stabilization and realignment. The City's Local Coastal Program; the primary planning document regarding sea level rise planning, remains unable to advance due to the City's recent withdrawal of the document from Coastal Commission Review. Meanwhile, the City acknowledges that the imperative for moving the tracks from their current location hinges on the lack of safety caused by bluffs that will experience accelerated erosion as sea levels rise. This is paradoxical — the City should own the need for relocation from sea level rise in all aspects of decision-making so that the coastal preservation and access progress made in this conversation may be allowed to benefit the City in a broader way.

Sincerely,

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