



Sep 20, 2021
Delivered via email
To: Del Mar City Council

Re: Item #2 Presentation By SANDAG on Del Mar Bluff's 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. Stabilization of the Del Mar section of the LOSSAN corridor railroad tracks is already having severe impacts on the city's coastline and coastal access, and we submit the following comments related to the bluff stabilization update.

Extreme bluff stabilization plans must adjust to a rapidly accelerating relocation timeline

[Right: A photo by a Del Mar resident depicts extensive emergency work in 2021]

Del Mar's bluffs are already severely affected from emergency stabilization work. Natural geology, coastal access, and bluff habitat have been affected in the long-term in multiple places. Surfrider is highly concerned that the SANDAG's long-term plans for Del Mar Bluff Stabilization Project Phase 5 & 6 will continue to mar the bluffs without having been adjusted to consider the advancing





timeline of the Del Mar Realignment Project.

In the past two years, the Del Mar Realignment Project (which will relocate the railway off the bluffs) has gone from a concept championed by some regional stakeholders to one with widespread political support. Support for realignment was pledged extensively at the first San Diego Regional Rail Corridor Executive Leadership Task Force in April 2021. Additionally, the City of Del Mar pledged its support in a [letter](#) to Surfrider dated August 24, 2021. SANDAG has also included plans for realignment in its [Regional Transportation Improvement Program](#), which was adopted by SANDAG's Board of Directors on February 26, 2021.

Many regional stakeholders including Surfrider are advocating for SANDAG to activate the realignment within the next 7 years — by the time President Biden leaves office. The blufftop and blufftoe work being proposed by SANDAG as interim stabilization will come with extensive negative tradeoffs for public access and public beaches; in particular the quarter mile of seawall being proposed will significantly erode and block access to Del Mar's special public beaches.

DMB5 and DMB6 were designed to stabilize the bluff for thirty years and therefore far exceed necessary measures for stabilizing the bluff for the next seven years, as the new timeline for Realignment calls for. **The current bluff stabilization proposals therefore should either be scaled back accordingly, or the public must be assured that mechanisms exist to reevaluate the scope of this work.**

Surfrider recommends that the City requests that SANDAG commit to reevaluating the Del Mar Bluffs Phase 6 (DMB6) proposal in three years, based on updated information about the alignment alternative selected, its completion timeline, and funding. 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.

In addition to reevaluating the scope of DMB5 and 6 at appropriate intervals to adjust to the realignment timeline, we maintain the priorities outlined in our [letter to City Council](#) on July 26, 2021:

- **Bluff stabilization infrastructure must be removed as soon as possible, and a funding and concept plan for seawall removal must be guaranteed upfront.** Beach destroying seawalls must not outlive their intended purpose.

- **Significant bluff stabilization activities warrant significant mitigation efforts.** The erosion rates SANDAG is using to justify the need for bluff stabilization efforts in the first place must also be used as a foundation for mitigation calculations.
- **Mitigation should be in the form of projects, with safe crossings incorporated.** Surfrider recommends that SANDAG include mitigation project proposals as part of its DMB5 federal consistency application to the California Coastal Commission. 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. City Council should consider accelerating the Coastal Connection Study timeline so the related results pertaining to possible mitigation options can be explored in the federal consistency review for DMB5. Mitigation should include opportunities for coastal access in the form of safe crossings.

Conclusion

[Right: Proposed Work in DMB5 may include extensive seawalls, DMB5 Alternative Analysis Report¹]

SANDAG's emergency and interim bluff stabilization work, as well as its diligence in realignment, will affect the coast and coastal access in the City for the foreseeable future. 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



Figure 44 - Existing Conditions



Figure 45 - Construction of improvements at the bluff top only

¹ https://drive.google.com/file/d/1fY1ry8ya_pv6Uo2vPfq2aST97NONpRPJ/view?usp=sharing



cannot be done, meaningful steps towards mitigation for these disastrous projects must be pursued.

Sincerely,

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