



January 24, 2023

Delivered via Email

Oceanside City Council
300 N Coast Hwy
Oceanside, CA 92054

Re: Council Item #23, Professional Services Agreement for Phase 2 of Sand Nourishment and Retention Pilot Project

Honorable Mayor and City Council,

Surfrider Foundation is a nonprofit environmental organization that engages a vast volunteer network of ocean users to protect our world's ocean, waves, and beaches. Surfrider's San Diego County Chapter (Surfrider) represents thousands of ocean recreation users — from dedicated surfers to occasional beachgoers — as well as the coastal communities and economies that rely on them throughout the region. Thank you for the opportunity to provide comments on the proposed agreement for Phase 2 of the City's Sand Nourishment and Retention Pilot Project. We appreciate City Staff for including our chapter as a stakeholder in the accompanying Staff Report.

Mistakes of the past are currently destroying Oceanside's beaches.

Surfrider sympathizes with the plight of Oceanside's beaches, or lack thereof, especially south of the pier where sandy beaches no longer exist except at low tides. The Staff Report correctly points out that construction of the Camp Pendleton Boat Basin in 1942, followed by the City's own Small Craft Harbor in 1963, effectively cut off a major source of Oceanside's historical sand supply. Surfrider is grateful to hear that the Army Corps of Engineers (ACOE) is finally re-launching their efforts to study mitigation for the breakwater's 80 years of starving Oceanside's shores of sand. This is an important step in the right direction.

However, the Staff Report does not mention several additional factors that have contributed to Oceanside's beach erosion. Historical net erosion has been occurring in Oceanside, and all of



the beaches within the Oceanside littoral cell, even before the Harbor Complex was created.¹ More importantly, Oceanside has historically allowed development too close to its shores. The sandy bluffs commencing at Pacific St. were paved over, with additional development below - on top of what used to be a beach - robbing the City's shores of untold amounts of natural sand replenishment. Beachfront development now sets an artificial, precarious back to the beach, which is further obstructed by the presence of riprap revetments across the vast majority of our public beaches. These revetments, and most of the structures they protect, sit atop former public beach space, blight the shoreline, pose danger to beachgoers, and further hasten beach erosion across Oceanside's coastline.

While no sitting councilmember bears responsibility for these past mistakes, we've seen little to no action taken in recent years to rein in continued beachfront development. Construction is presently occurring at Hayes and S Pacific St., for example, where waves regularly lap onto the street at high tide. Attempting to fix the shoreline at an artificial location where development occurs will always conflict with environmental conditions. Surfrider will continue to advocate for Oceanside to submit a Local Coastal Program Update that includes, among other things, stricter setback guidelines for beachfront development and a trigger-based adaptation plan that includes managed retreat. In the long term, thoughtful long term planning is the only way to restore Oceanside's beaches.

In the meantime, Surfrider applauds the City's decision to hire its first Coastal Zone Administrator. There is no one-stop solution to saving our beaches, and bringing on a dedicated staff member is an important consideration to help the City seize every possible short, medium, and long-term opportunity to help Oceanside's beaches (case in point: renewing Oceanside's Sand Compatibility and Opportunistic Use Program (SCOUP) permits²).

Sand nourishment in an age of accelerated sea level rise will yield short-term benefits at best, even if coupled with retention.

When done correctly, sand replenishment projects - such as a SANDAG Regional Beach Sand Replenishment or the Encinitas-Solana Beach's 50-year Coastal Storm Damage Reduction

¹ Group Delta , Shoreline Erosion Study, North Solana Beach, California, 8/98. Cited as a reference in the ACOE EIS cited above. Even under natural conditions the coast in this area experienced net erosion of 30-40 ft per century.

²<https://www.sandag.org/projects-and-programs/environment/shoreline-management/beach-sand-management/sand-compatibility-and-opportunistic-use-program>



Project - can serve as effective short-term strategies for retaining sandy beaches and staving off damage to coastal infrastructure. To the extent that this can be the case in Oceanside, Surfrider supports the Phase 2 aspects that include exploring opportunities for sand nourishment via offshore collector sites and/or construction of a functional bypass system around the Harbor Complex. We also support GHD's Baseline Monitoring Program, Littoral Sub Cell Study, and Citizen/Community Science Program as they may help deepen our working knowledge of sand behavior in and around Oceanside.

We recommend that when these studies end, GHD and the City put an estimated timeline on the project similar to the Encinitas-Solana Beach sand replenishment project (i.e. 50 years). It's important that both the City Council and public understand exactly how long this project is intended to have benefits, so as not to contribute to the false notion that sand replenishment is a panacea for beach loss. This is especially important given NOAA's predictions of 8-12 inches of sea level rise (SLR) for our region in the next 30 years, with an additional 2-7 feet by 2100 depending on the global community's ability to curb GHG emissions³. NOAA goes on to predict that by "by 2050, 'moderate' (typically damaging) flooding is expected to occur, on average, more than 10 times as often as it does today, and can be intensified by local factors."

We did not see any mention of effective timeline or consideration of SLR in the GHD Scope of Work. Don't get us wrong, a properly implemented beach replenishment project could benefit Oceanside's beaches for 25-50 years. But given the alarming level of coastal squeeze *already* being experienced at Oceanside's beaches, and coupling that with the high costs, long permitting timelines, and finite amount of sand available for replenishment projects, it's important to keep expectations realistic even under the most optimistic of SLR predictions. Lastly, as surfers we will always advocate for a robust surf monitoring program associated with any large-scale beach replenishment project.

Surfrider cannot support the Oceanside Sand Retention Project without assurance that permanent hard structures, such as a traditional groin field, will not be included in the final proposal.

At this time, Surfrider remains opposed to a traditional groin field in Oceanside for a number of reasons. Groins are a blunt instrument that impede sand flow and will negatively impact downdrift beaches, just like the Harbor jetties although to a different degree. The Harbor jetties operate by the same principle as groins, and have affected not only Oceanside's beaches but

³ <https://oceanservice.noaa.gov/hazards/sealevelrise/sealevelrise-tech-report.html>



every beach south all the way to Black's in La Jolla. Groins such as those at the Harbor Complex and Agua Hedionda are partly to blame for necessitating the aforementioned 50 year sand replenishment project in Encinitas and Solana Beach; this is undisputed and clearly recognized in Volume 1 of ACOE's Final Environmental Impact Statement on the project⁴.

Groins are also permanent, hard structures that future generations will likely be stuck with, like the Harbor jetties. For all these reasons, groins are an engineering strategy of days past that have been widely criticized for their crude impacts to waves and regional beach management. Even ACOE, the builder-of-things on the coast, describes groins in its Coastal Engineering Manual as "probably the most misused and improperly designed of all coastal structures⁵."

We do appreciate that the Phase 2 proposal has stepped back from the initial 4 groin pilot proposal that both Surfrider and several downdrift coastal cities opposed. The newly proposed Scope of Work includes several reassuring elements, including a commitment to robust public outreach, the inclusion of both neighboring cities and regional stakeholders throughout the process, and several assurances that the sand retention project will not cause adverse erosional effects to downdrift neighboring communities. However, even with these assurances, there are not yet concrete details that allow us to comment on whether the design competition will bring forward innovative and/or nature-based approaches that have not previously been considered, although we certainly hope it will.

Despite stepping back from a groin field as the foregone conclusion for the sand retention element of this project, we're still concerned that groins, an artificial reef, or some other permanent, hard structure remains the likely result of the design competition. We hope this isn't the case, because if so, there is a *very high* probability that Surfrider, all or most of your southern neighboring coastal cities (and SANDAG members), and the Coastal Commission - who holds final permitting authority - will oppose this project. The Coastal Commission has not permitted a groin for the sole purpose of sand retention for at least 20 years due to the issues with these structures that have been described. The end result of the Phase 2 Sand Retention Project should not be wasted taxpayer money and a disappointed community. **Therefore, we ask that the Council instruct City Staff/GHD to remove traditional groins and any other**

⁴ [Volume I The Final Integrated Feasibility Study & EIS/EIR and Chief of Engineers' Report for the Encinitas-Solana Beach Coastal Storm Damage Reduction Project, San Diego County, California, page 72-73](#)

⁵ ACOE Coastal Engineering Manual, 2002. Also states groins are "probably the most dramatic cause of man-induced coastal erosion."



permanent, hard structures from consideration in the “pre-established design criteria” that will ultimately guide the design competition if this item is approved. Taking such a step would help ensure that an “innovative and/or nature-based approach,” as it’s referred to several times throughout the Scope of Work, *actually occurs*.

Thank you for the opportunity to comment on this item.

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