



November 19, 2024

Delivered via Email

Oceanside City Council
300 N Coast Hwy
Oceanside, CA 92054

Re: RE:BEACH OCEANSIDE PILOT PROJECT SITING ANALYSIS AND RECOMMENDATION

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 Staff Report and the proposed location for the RE:BEACH pilot project.

Surfrider awaits further scientific modeling, feasibility analysis, and environmental review before weighing in on whether RE:BEACH can keep its promises to restore Oceanside's beach while eliminating and/or mitigating negative impacts to downdrift beaches. We are also adamant that robust surf modeling and monitoring must occur. However, based on the three proposed project sites and the siting analysis used to evaluate them, we agree with the RE:BEACH team's recommendation for Segment 1: Tyson St and Wisconsin Ave.

Segment 1 is the superior choice for several reasons, all affirmed via the siting analysis. One, Segment 1 is where Oceanside's sandy beach ends. It makes logical sense to connect the pilot project to an existing sandy beach, rather than to create an isolated beach where one currently no longer exists. Secondly, Segment 1 is fronted by public property. This reduces potential challenges, conflicts, and risks that might arise from private beachfront property owners. It also reduces access challenges for construction, etc. Third, the public property that fronts the beach allows the City more opportunities to include additional coastal resilience features, including but



not limited to a dunepark at Tyson St., rerouting or retreat of the Strand, engineered dunes in place of or atop the revetments that protect The Strand, and a pier plaza/bandshell redesign that allows space to reclaim some of Oceanside's historic back beach. Long-term coastal adaptations like these will ultimately be key to preserving Oceanside's beaches, and should be pursued regardless of RE:BEACH.

After all, RE:BEACH is not a panacea. It's only meant to buy the City time to begin long-term sea level rise adaptation. As stated in RE:BEACH's initial Project Assumptions, *"the objective is to create more time and space for the City to develop a comprehensive adaptation strategy for coastal resources¹"*.

Surfrider agrees with the RE:BEACH team that the project must be a pilot that is both adaptable *and* removable, with strict monitoring criteria for effectiveness, impacts to surfing, and impacts to downdrift beaches. These points are all memorialized in the RE:BEACH design criteria. We urge the City Council to reject any stakeholder demands to scale up this pilot project to cover a larger section of Oceanside's coastline. Any attempts to enlarge the project's scope will likely result in a denied Coastal Development Permit at the Coastal Commission, and thus a failure of the entire RE:BEACH project.

Lastly, Surfrider appreciates the Staff Report's inclusion of additional, ongoing coastal management efforts that extend beyond the RE:BEACH project. We support utilization of SCOUN permits, development of dunes, removal of impediments in the San Luis Rey river mouth, and execution of the Buena Vista Lagoon Enhancement Project. However, we also call on city leadership to prioritize a much-needed update to the City's 1986 Local Coastal Program Land Use Plan (LCP). Despite chronic erosion and the best available science predicting a minimum of 2-3 feet of sea level rise by 2100, the City has done little to prevent continued beachfront development atop its historic back beach due in part to an outdated LCP. An updated LCP (or LCP amendment) should include, at a bare minimum, increased coastal setbacks for new beachfront construction. Oceanside will eventually need to move coastal infrastructure landward from an encroaching ocean; it's inevitable. The sooner we set proactive policies in place to ease the pain of this eventual relocation, the better.

At this time, we are supportive of staff's request for your approval to proceed with final design, engineering, and environmental compliance tasks for RE:BEACH. But please remember, Oceanside cannot afford to put all of its eggs in the RE:BEACH basket. Please support any and

¹ Project Assumptions, p.13 of attachment 1 in January 31, 2024 RE:BEACH Staff Report



all efforts to streamline additional coastal management efforts. We especially support long-term sea level rise adaptation that prioritizes coastal preservation along publicly owned beachfront, and coastal zone land use updates to prevent continued unsustainable private development atop the historic back beach.

Thank you for the opportunity to comment on this item.

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