



January 31, 2024

Delivered via Email

Oceanside City Council
300 N Coast Hwy
Oceanside, CA 92054

Re: Comments on Special Council Workshop for RE:BEACH Oceanside Coastal Resilience Competition

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 proposed action items for the RE:BEACH Coastal Resilience Competition.

There is not enough information for Surfrider to take a conclusive position

As a non-voting member of the design selection committee aka jury, Surfrider participated in every public meeting and was present for the final jury deliberation and vote. We want to be clear with both the City Council and the public that although both the jury and the commenting public coalesced around ICM's Living Speedbump concept, the design is far from finalized and could evolve significantly in the next 1-2 years as the result of numerical modeling, feasibility studies, additional stakeholder input, financial considerations, environmental review, permitting considerations, the availability of beach quality sand, and many other factors which are impossible to fully predict.

For these reasons, it is still too early for Surfrider to take a hard position on ICM's proposal. Instead, we would like to use this opportunity to highlight both what we commend, and what



concerns us. We will also suggest additional steps the City of Oceanside should consider taking to preserve and restore its coastline in the meantime, *while* the RE:BEACH process moves along over the next 1-2 years.

RE:BEACH has done a good job bringing stakeholders together and taking a regional approach

Surfrider commends the City for pivoting away from a groin field proposal that did not properly consider downdrift impacts to South Oceanside and beaches further south. While the RE:BEACH design competition had its own share of flaws, it was much more inclusive and representative of regional coastal interests than the previous groin field pilot proposal. We appreciate the regional considerations memorialized in the project criteria, including the following¹:

- Designs should strive to positively impact the region both directly (i.e., by increasing sediment in the littoral cell) and indirectly.
- Designs should be particularly sensitive to the potential for sand retention strategies to impact the flow of sediment through littoral systems and be designed to eliminate, minimize², or mitigate potential negative impacts to downdrift sand supply.

Surfrider agrees with both the RE:BEACH team and the California Coastal Commission that regardless of how the final proposal evolves from here, it must remain a pilot project 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 as well.

To that end, we urge the City Council to reject any stakeholder input asking you to scale up this pilot project to cover a larger section of Oceanside's coastline than what is currently proposed. The Coastal Commission has signaled that only a pilot will be considered for permitting at this time. Any attempts to enlarge it will likely result in a denied Coastal Development Permit, and thus a failure of the entire RE:BEACH project.

Constructive criticism of the RE:BEACH process thus far

¹ From RE:BEACH Design Criteria Five: Regional, p.12 of attachment 1 in the Staff Report

² For the record, we do not agree with "minimize" because it's not quantifiable.



Since Phase 1 of this project, the City of Oceanside has consistently referenced the Harbor Complex as being responsible for its beach erosion problems. While the Harbor Complex significantly interrupted sand flow to Oceanside, the Harbor alone is not solely responsible for Oceanside's beach erosion.

Development across the entirety of Oceanside's historic back beach is another major contributing factor to beach erosion in Oceanside. The City's Coastal Zone Administrator, Jayme Timberlake, has verbally recognized this fact at several public meetings, but we have never seen such recognition in any of the RE:BEACH documents. Surfrider would like to see the City be forthcoming about all of the contributing factors to its erosion problem. If the City does not communicate to the public about the entire spectrum of reasons our beaches are disappearing, then how can we expect the City to present a comprehensive set of potential solutions?

Specifically, Oceanside would be an eroding shoreline absent the effects of the harbor and sand blockage in the rivers. Much of the coastal development in Oceanside is either seaward of the historic bluff lines or would be seaward of high tide lines even if sand were not blocked by the harbor. The intent of the project is to build a beach more seaward of natural locations absent development and natural erosion. The project description should provide a more accurate description of the natural conditions as well as all human induced hazards including development seaward of natural erosion boundaries.

Also, the idea that sand flow is so complicated that we can't generally predict a southerly flow of sand has pervaded RE:BEACH meetings. While we respect complexities, research and history has shown that the majority of sand moving through this area flows south. When SANDAG placed beach quality sand on Oceanside's shores as part of their 2012 Regional Beach Sand Replenishment Project 2 (RBSP2), much of that sand ended up in Carlsbad³ (this general trend is evidenced in many other research reports as well). That point should not be buried because it illustrates that the dominant longshore current direction of littoral flow in Oceanside is to the south. Surfrider is not comfortable with any non-peer reviewed implications that sand travels equally in both directions, and/or that sand movement is independent within each littoral cell.

Furthermore, it is an undisputed fact that coastal structures, like groins in Oceanside and Agua Hedionda, have necessitated a massive sand nourishment project in Solana Beach and

³ Section 4.3, p. 27 [Oceanside Beach Sand Replenishment and Retention Device Project. GHD. September 2021.](#)
Re: RBSP2 in Oceanside: "The placement locations can be seen in Figure 4-5 and clearly illustrate the... accumulation of sand along North Carlsbad...the upper profile shows a steady loss of dry beach width which appears to have largely moved in the alongshore direction to the south."



Encinitas. The pending Encinitas and Solana Beach Army Corps Project recognizes that impediments to littoral flow are part of the cause of sand loss.⁴

Impacts to surfing must be clearly articulated

While improving surfing is a goal, it is not the primary goal of the project. The primary goal is to retain sand. Our reading of the studies is if retention minimizes the effect on surfing, that might be deemed adequate as an environmental impact. Surfrider cannot accept any negative impacts to surfing. Surfing is already impacted by the mere presence of structures on the beach, including but not limited to roads and revetments. The roads and revetments largely front structures built seaward of bluffs. The summary of ICM states that surfing expectations must be managed as an uncertainty.

⁴ See 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](#): "Historical: Prior to 1940, the San Diego County coast experienced periods of relatively abundant sand supply following large sand injections from river floods due to the upland absence of channel concretization and damming. ***In addition, since the alongshore sediment transport was not disrupted by shore perpendicular coastal structures, the beaches within the Encinitas and Solana Beach coastal zone were relatively stable.*** Between 1960 and 1978, ***the effects of manmade coastal structures, namely at Oceanside Harbor and Agua Hedionda Lagoon, had a subtle impact on the stability of the coastal beaches within the project study area*** as the predominant storm and wave events during this period were fairly benign. However, from 1978 through to the present, a period during which extreme wave episodes have been well above average when compared to other periods over the past century, human intervention in the form of coastal structures and upstream dams on major rivers has had a profound impact on the now erosive nature of the beaches of Encinitas and Solana Beach. As a result, the average net transport rate was estimated to be between 40,000 and 56,175 cubic yards per year to the south in the project study area since the early 1980's (USACE-SPL, 1991 & Coastal Environments, 2001). The CCSTWS (USACE – LAD, 1991) report estimates net transport alongshore into this sub-cell as 270,000 cy/yr for the two pre-1980 sediment budget time periods.

Present: The above referenced historical sediment budget quantities indicate that the health of the Encinitas and Solana Beach coastal region is largely dependent upon the wave climate and the degree of human intervention. It is evident from the analysis of the sediment budget that human activity within the influence of the coastal zone has had both negative and positive effects on the beach width within the study area. The negative impacts have been due primarily to poor watershed management practices and, to a lesser extent, the construction of Oceanside Harbor, which have significantly reduced the sand supply within the Encinitas and Solana Beach study area by curtailing both the flood waters and by disrupting the natural flow of the alongshore littoral transport. In order to mitigate the losses associated with the reduction in the delivery of sediment to the coastal zone, beach nourishment efforts have been instituted at several locations within the study area. These nourishment efforts have resulted in the placement of approximately 783,200 cubic yards of sand along the Encinitas/Solana Beach shoreline to date. The replenishment includes the regular sand-bypassing at Batiquitos Lagoon since 1998, annually imported material at Moonlight Beach for the past ten years, an opportunistic sand placement at Fletcher Cove, and the 2001 SANDAG RBSPI project.



"Confidence that concept will result in a significant degree of slowing of longshore transport. Uncertainty around the exact degree to which sand is slowed and retained at the beach. ***The expectation of a 'surfing reef' should be properly managed as the reef's primary objective is sand retention and storm protection.***"⁵

In addition, past studies including one at Fletcher Cove also suffered from a conflict between surfing and retention goals⁶. Also, both Pratte's Reef (Surfrider project) and Boscombe Reef failed as artificial reef projects. All relied on geotextile bags in the design. For Oceanside, rock would likely be used and raise additional concerns.

We can't afford to put all of our eggs in the RE:BEACH basket

Regardless of whether the final sand retention project is permitted and ultimately installed, RE:BEACH alone will never be enough to restore Oceanside's beaches in the long term. Surfrider believes that most of the stakeholders understand this, including the RE:BEACH team, who included *"the objective is to create more time and space for the City to develop a comprehensive adaptation strategy for coastal resources"*⁷ in their Project Assumptions. Surfrider agrees that the City needs to develop such a comprehensive strategy. Hiring a Coastal Zone Administrator was a great start, and Surfrider supports many of the additional strategies listed on Oceanside's [Coastal Management webpage](#) and the Staff Report for this item⁸. There is so much more the City of Oceanside can do to improve our beaches and coastal resilience, especially if every department worked together on prioritizing our coastline.

The city should embrace popular concepts from other proposals, such as [SCAPE's Tyson Street Dunepark](#) concept. Although SCAPE's final proposal failed to captivate the jury, they unanimously endorsed Dunepark. *"Dunepark was lauded as an exceptional concept that could be explored at a later date beyond RE:BEACH by the City of Oceanside, as an improvement to the existing shoreline park at Tyson St⁹."* Surfrider agrees, but with one caveat - scoping for the Dunepark project should start immediately, not "at a later date beyond RE:BEACH."

⁵ See table on Page 12 of Staff Report in Row titled "Largest risk or uncertainty around concept" (***emphasis added***)

⁶ See for example a review of the [project by Dick Seymour of Scripps](#). To paraphrase, the main takeaway is that an artificial reef can either retain sand or create a surf break, but it cannot do both.

⁷ See Project Assumptions, p.13 of attachment 1 in Staff Report

⁸ Summarized on p.15, Ongoing Coastal Monitoring and Management

⁹ Page 10 of Staff Report, Jury Feedback

Unlike ICM’s concept, which relies on untested assumptions to conclude it can restore Oceanside’s beaches, “*there is a high degree of certainty around the stability of the upland Dunepark position of the [SCAPE] proposal.*”¹⁰ Restoring a former beach that was paved over and turned into a roadway and park is simpler, cheaper, and guaranteed to expand sandy beach space. The same cannot be said of ICM’s proposal, which uses a multifaceted approach to rebuild an eroded beach seaward at a time when sea level rise is accelerating at its highest rate in thousands of years. Success is far from assured, and many negative consequences are possible.



As the juxtaposed images of existing Tyson Street Park vs. Dunepark illustrate, this is a less risky project based on a simple design. It is highly likely to be funded within the current paradigm of state and federal coastal resilience funding, relatively easy to permit since it’s on city-owned property, and will provide 100 feet of sandy beach exactly where the existing sandy beach disappears. In terms of beach restoration, it’s a slam dunk.

¹⁰ Page 12 of Staff Report in ROW titled “Largest risk or uncertainty around concept”



Rerouting The Strand to create more beach space could also help Oceansiders revisualize what the future could look like for the entire publicly owned Pier Plaza area. The current [Beachfront Improvement Feasibility Study](#) fails to adequately address sea level rise and would benefit from the coastal resilience perspective of a concept like Tyson Street Dunepark. Oceanside's own 2019 Coastal Hazard Adaptation Plan says the following about The Strand, which has been susceptible to coastal flooding for 40 years:

In the near-term (e.g., before 1.6 feet of sea-level rise) the revetment/sea wall along the Strand could be maintained or improved and beach nourishment could be continued. This would provide property owners time to raise and/or flood-proof their homes, vacation rentals, and public property. Access would likely need to be shifted to Pacific Street. In the long-term (e.g., around 3.3 feet of sea-level rise), the Strand could be abandoned and utilities relocated.¹¹

If the City is planning beachfront improvements that are unlikely to even survive a 75-year project life according to its own coastal adaptation study, something is amiss. A siloed approach, where city departments seemingly aren't properly communicating, will guarantee Oceanside continues to lose its beaches.

Similarly, we call upon the City of Oceanside to enforce its own development codes in the Coastal Zone. Surfrider, along with concerned Oceanside residents, must routinely appeal and/or comment on locally approved developments to the Coastal Commission in order to ensure that the Coastal Act and Oceanside's approved Local Coastal Program (LCP) are properly adhered to. Last year, the Commission required removal of over [10 unpermitted developments](#) from beachfront homes for a project that was unanimously approved at the [Planning Commission \(approval recommended by City Planner\)](#)¹². These are violations that the City's Planning Department should enforce on its own. Surfrider invites City Code Enforcement to join us for a low tide walk across the beach in South Oceanside and Townsite - we can point out dozens of unpermitted coastal development, revetments in various states of disrepair with rocks strewn across public beach, etc., all of which are negatively affecting public beaches. Additionally, zoning updates must be integrated into Oceanside's LCP Update to ensure better setbacks for future development on South Pacific Street.

Surfrider is willing to work with both the City Council and staff in support of any or all of these suggestions.

¹¹ Section 5.4, Coastal Flooding and Beach Erosion Adaptation Recommendations

¹² Staff recommends approval at 12:40 in the meeting recording.



In conclusion, Surfrider remains hopeful that our remaining questions will be answered as the RE:BEACH project evolves over the next 1-2 years. While Surfrider neither supports nor objects to the Living Speedbumps design concept at this time, we will continue to monitor and advise the project as it moves forward, as we appreciate the RE:BEACH team and City Council for including us as a stakeholder and in the design selection jury. In the meantime, we strongly encourage the consideration of additional steps and measures to preserve Oceanside's beaches and offer our concerted support for making them a reality.

Thank you for the opportunity to comment on this item.

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